

**DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
FLIGHT STANDARDS DIVISION**

**NATIONAL AVIATION SAFETY INSPECTION PROGRAM  
INSPECTION REPORT AND FOLLOW-UP ACTION**

**VALUJET AIRLINES, INC.  
d.b.a.  
AIRTRAN AIRLINES  
AIR CARRIER NO: VJ6A465W  
ATLANTA, GA**

**OCTOBER 20, 1997 - JANUARY 30, 1998**



# FAA News

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Contact: Alison Duquette

Phone: 202-267-8521

**Fact Sheet****National Aviation Safety Inspection Program (NASIP)**

- The NASIP is one tool used by the FAA to examine the operations of an air carrier. Other tools include the initial certification, ramp inspections, flying in the jump seat to observer crews, onsite inspections, and reports from outside.
- A NASIP is a snapshot of a carrier's operations taken by a team of inspectors from outside the carrier, drawing on their own experiences, expectations and assumptions. They catalogue their observations, termed "findings," for later in-depth study by investigators from the office that supervises the carrier under scrutiny. The NASIP report is often written in detailed technical language to give specific guidance to local inspectors in their follow-up examination of the observations.
- A NASIP checks for compliance with Federal Aviation Regulations that apply to the carrier and its operations; compliance or adherence to guidance developed by the carrier and approved by the FAA; and the reliability or integrity of the carrier's systems or guidance to ensure it complies with aviation regulations.
- Typically, the NASIP team conducts its inspection, briefs its observations to the FAA office that manages the certificate and is responsible for the follow-up investigation, and it briefs the carrier. A draft report is prepared, and ultimately a final report is prepared. Then, the FAA office supervising the carrier has 120 days to examine the findings, determining which require any action such as a manual or procedure change, or enforcement action. Often, some findings are unsupported in the subsequent investigation.
- The ValuJet/AirTran NASIP used a team of inspectors which took an extremely conservative approach, leading to the high number of findings or observations. Because a few of the initial observations, if substantiated, could have serious safety implications, and because of differences of opinion between the NASIP team and local inspectors over the import of the observations, the FAA sent in senior inspectors – including members of the new Certification Standardization and Evaluation Team – to examine the most serious of the observations rather than waiting for the 120-day process to run its course. Meanwhile, the FAA office holding the carrier's certificate continued its work validating – proving or disproving – the observations found in the initial inspection. Ultimately, of the 106 findings, 60 were not substantiated.

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## **INTRODUCTION**

The intention of this report is to provide an understanding of:

1. The findings of a National Aviation Safety Inspection Program (NASIP) team at ValuJet / AirTran Airlines during a scheduled inspection during October 13 through November 7, 1997,
2. The results of the follow up investigation to these findings conducted by the ValuJet / AirTran Airlines Certificate Management Team in the Atlanta Flight Standards District Office, and
3. A summary of the dispositions of each finding, including the specific corrective action and the initiation of regulatory enforcement investigations where such action was necessary.

It should be noted that NASIP team members are generally selected from diverse assignments with various air carriers and do not have an detailed knowledge of the distinct operations of the specific airline they are inspecting. Thus, the initial findings are frequently modified with reference to information obtained from the initial debriefing of the Certificate Holding District Office (CHDO) and during the follow-up investigations. Historically, initial NASIP findings reports often express potential or possible concerns raised within the time-compressed period of the NASIP inspection and are revised substantially upon further investigation and analysis of the specific issues. Additionally, the FAA's customary practice has been to release the initial NASIP findings report soon after the inspection and then publish the subsequent in-depth investigative report as a separate document.

However, to facilitate a thorough understanding of the safety and compliance issues affecting ValuJet / AirTran Airlines, both the initial NASIP team's findings and the results of the CHDO's subsequent follow up actions have been combined as a single report. This comprehensive effort affords the detached context to examine all of the initial NASIP findings through to their investigative conclusions without creating an inaccurate assumption. The FAA has decided to utilize this format in future NASIP reports.

Of note, a number of findings have resulted in enforcement actions. These are identified by the EIR numbers listed in their respective Corrective Actions. A few of the findings have resulted in more lengthy investigations and corrective actions than could be completed in the time allotted for this report. Therefore, some of these actions have not yet been closed. These issues will be addressed in separate correspondence following their completion.

## **EXECUTIVE SUMMARY**

The following executive summary is divided into sections. The first section is a summary of the inspection developed by the NASIP team leader. The second summary describes the follow-up action of the NASIP inspection findings.

### **NASIP TEAM SUMMARY**

In accordance with the National Aviation Safety Inspection Program (NASIP), a team of Aviation Safety Inspectors conducted an inspection of ValuJet Airlines, Inc., d.b.a. AirTran Airlines, from October 20 through November 7, 1997. The areas inspected are listed in the Table of Contents of this report. All reference to ValuJet Airlines, Inc. in this report will be AirTran Airlines.

AirTran Airlines corporate headquarters is located at 1800 Phoenix Blvd., Suite 126, Atlanta, Georgia. AirTran Airlines provides scheduled domestic air carrier passenger service from Atlanta, GA, to 12 states operating 31 McDonnell Douglas DC-9-32 type aircraft. The company employs approximately 2403 personnel and has its main maintenance and crew bases in Atlanta, GA with contract maintenance facilities in Macon, GA and Lake City, FL.

Findings documented during this inspection that are being investigated for possible non-compliance with Title 14 of the Code of Federal Regulations (CFR) are: Operations Specifications, operations manual, operations training, operations training records, duty/flight time limitation and rest requirements, flight operations, and operations records. Additionally, the maintenance department findings for non-compliance with Title 14 of the Code of Federal Regulations are: Management, certificates and Operations Specifications, manuals and procedures, training programs, records system, maintenance facilities, contractual arrangements, MEL/Deferred maintenance, weight and balance program, Airworthiness Directives compliance, maintenance programs, maintenance inspection system and required inspection items, continuing analysis and surveillance program, and aircraft ramp inspections.

AirTran Airlines was found to have deviated from its approved or accepted procedures in the areas of duty/flight time limitations and rest requirements, operations records, maintenance manuals and procedures, maintenance training programs, maintenance facilities, MEL/deferred maintenance, weight and balance programs, maintenance programs and aging aircraft program.

Compliance issues raised during this inspection were discussed with company personnel and the Principal Inspectors. Those issues that could not be satisfactorily resolved, became findings in the body of the report. In the case of findings where enforcement action is anticipated, physical evidence and supporting documentation have been provided to the certificate holding district office (CHDO).

The team would like to thank both AirTran Airlines and the Certificate Management Unit (CMU) for their cooperation and support given the team during the inspection. The assistance and preparations made by AirTran Airlines was a contributing factor to the inspection being completed on schedule.

**FOLLOW-UP ACTION SUMMARY**

This report addresses the 106 findings from the Draft 3 NASIP report, provided to the Atlanta FSDO on November 26, 1997. The report is divided into two sections titled Operations (34 findings) and Airworthiness (72 findings). Each finding is followed by a corrective action describing the action taken by the Atlanta FSDO and AirTran Airlines.

Each of the 106 findings were fully investigated by the Atlanta FSDO. In addition to the work accomplished by the Atlanta FSDO, the office received assistance from an independent review and analysis team, an independent consulting team of inspectors, CSET team members and ASO-290.

Of the 106 findings, the Atlanta FSDO did not find evidence to substantiate 60 findings (18 Operations and 42 Airworthiness). The Atlanta FSDO initiated Enforcement Investigative Reports for 25 of the findings. All findings that were substantiated by the FSDO have either been corrected by the airline or corrective action is in progress and will be tracked by the Atlanta FSDO with the use of an action plan for closure. Future close out actions will be recorded in the Program Tracking and Reporting System (PTRS).

The Atlanta FSDO found no significant issues that would have a direct impact on safety, or systemic failures with AirTran Airlines. We found no evidence of fraudulent activities. In addition, there was no indication of improperly trained or unqualified flight crew members nor aircraft operating in an unsafe condition. This conclusion was validated by an independent review and analysis team of senior inspectors.

# **OPERATIONS**

**MANAGEMENT AND ADMINISTRATION****1.01****DESCRIPTION:**

AirTran Airlines has an Operations Management Team that consists of a Senior Vice President of Operations, Vice President of Flight Operations, Director of Safety, Chief Pilot, and Director of Flight Standards and Training. All the positions were filled with full time employees.

In addition to the above, the company has a Vice President of Inflight Services, Director of System Operations Control, Director of Stations, Director of Inflight and Customer Service Training, and Director of Inflight Services.

**INSPECTION DATA:**

The Vice President of Flight Operations, Director of Safety, Chief Pilot and the Director of Flight Standards and Training were interviewed and their training folders and resumes reviewed to determine that they were qualified to hold their respective positions.

**FINDINGS:**

None.

**OPERATIONS SPECIFICATIONS****1.02****DESCRIPTION:**

AirTran Airlines is the holder of Air Carrier Certificate VJ6A465W. The certificate holder is authorized to conduct domestic and supplemental air carrier operations in common carriage pursuant to 14 CFR Parts 119 and 121.

The original Operations Specifications, part A, B, C, D and E are kept in the Technical Publications Office, located at 1800 Phoenix Blvd., Suite 126, Atlanta, GA 30349.

The Operations Specifications contain six (6) exemptions in paragraph A5. These exemptions were 3585J or as amended, 5408D or as amended, 3474 G or as amended, 5487B or as amended, 5317F or as amended, and 6395 or as amended.

**INSPECTION DATA:**

Sections A, B, and C of the Operations Specifications were reviewed utilizing criteria and standards set forth in 14 CFR Parts 119 and 121.

**FINDINGS:**

**1.02.01:** A review of the Operations Specifications revealed that the original copies held by the operator contained paragraph A001, dated 9/19/97, that authorizes the operator to conduct domestic operations pursuant to 14 CFR Parts 119.21(a)(4) and 119.21(a)(3)(i).

The first regulation, FAR 119.21(a)(4), is not appropriate for the operator's domestic operation. The second regulation, FAR 119.21(a)(3)(i), does not exist. Therefore, the company is not in compliance with 14 CFR Part 119.7(a).

Note: It should be noted that when this discrepancy was brought to the attention of the operator, a new paragraph A001 referencing the correct FARs was obtained from the CHDO.

**CORRECTIVE ACTION:** The Atlanta FSDO reissued Section A-1 of the AirTran Airlines Operations Specifications, on 10/23/97, referencing CFR Part 119.21(a)(1).

Finding closed.

**1.02.02:** Paragraph A031 of the company Operations Specifications states that the operator may use the services of TransCon, Euless, TX, to conduct dispatcher initial and recurrent ground training.

Furthermore, paragraph A031 states that “the certificate holder shall have a program or method that detects, identifies and provides timely corrective action for all deficiencies in the training program provided by each subject training organization.”

A review of the company’s approved Flight Operations Training Manual, and an interview with the company’s Director, System Operations Control and the Director of Safety, revealed that the company does not have an audit program for TransCon as required by paragraph A031. Therefore, the company is not in compliance with 14 CFR Part 119.5(g).

**CORRECTIVE ACTION:** When the Dispatcher Training Contractor, TransCon, was added to Section A-31 of ValuJet Airlines Operations Specifications on August 21, 1997, the POI had received verbal notification from the Director of Operations Control that he had just completed an audit of TransCon. The Director of Operations Control reviewed the audit with the POI. Written notification was received on September 11, 1997. In the process of that audit, the Director of Operations Control had reviewed TransCon’s list of instructors and selected the specific individuals to be utilized by the company. A revision to the Flight Operations Training Manual, addressing future audits of TransCon, was received by the FSDO on September 24, 1997. However, this revision was deemed to be too vague by the POI. The Director of Operations Control was asked to rework the revision so that it followed the same format as the section referencing the annual audit of Flight Safety (the company’s other Operations Training Contractor). The modified revision to the FOTM (pages 1-1-19 and 1-1-20) was submitted to the POI for review and approval with the proposed date of distribution shown as October 15, 1997. (The procedures agreed to by the company and the FAA under the 1996 Consent Order require the company to submit all revisions to the FAA for review and approval prior to publication, utilizing the anticipated date of publication rather than the date of submission as the reference date.)

Revision 33 to the Flight Operations Training Manual, establishing the TransCon audit program was reviewed prior to the beginning of the NASIP and Approved by the POI at that time. The date shown on the FOTM revision reflects the date of distribution and not the date of submission to the FAA for approval. The company is in full compliance with CFR 14 Part 119.5(g).

Finding closed.

**MANUALS AND PROCEDURES****1.03****DESCRIPTION:**

In accordance with 14 CFR Part 121.133, AirTran Airlines has prepared and maintains a company manual to provide guidance for flight and ground operations. The company manual is maintained by AirTran personnel, located at 1800 Phoenix Blvd., Suite 126, Atlanta, GA.

The individual manuals pertaining to 14 CFR Part 121 operation and their current revision status are listed below.

<u>Manuals</u>	<u>Revisions</u>
Flight Operations Manual (FOM)	13
Flight Operations Training Manual (FOTM)	32
Aircraft Operation Manual (ADM)	23
Airport Analysis Manual (AAM)	46
Minimum Equipment Manual (MEL)	30
Flight Attendant Manual (FAM)	14
Winter Operation Manual (WOM)	24

The manuals are distributed to the CHDO and appropriate company personnel. The company revises manuals individually as the need arises and revisions are distributed to flight crewmembers via their mail boxes and "Pilot Read File" Bulletins.

**INSPECTION DATA:**

AirTran Airlines' master manuals, pertaining to 14 CFR Part 121 operations, were reviewed to determine compliance with the company's Operations Specifications and the appropriate regulations.

**FINDINGS:**

**1.03.01:** A review of the Flight Attendant Manual determined that the instructions for the operation of the tailcone exit are incomplete. All the functions required to be performed in the event the tailcone slide fails to deploy are not included in the manual.

Therefore, the company is not in compliance with 14 CFR Part 121.135(b)(11) in that the tail cone procedure has incomplete instructions relating to emergency equipment and procedures.

**CORRECTIVE ACTION:** The Flight Attendant Manual (FAM) at the time of the NASIP did contain a procedure for Flight Attendants to follow should the tailcone slide fail to deploy. AirTran Airlines maintenance and engineering personnel state the procedure, as it existed, was accurate and would work.

The FAM is only one source of information for Flight Attendants, and is rarely as complete or detailed as what is presented during training. The Atlanta FSDO reviewed the FAM, VJ6A Maintenance Manual and observed the training of the tailcone exit both prior to, and following, the NASIP inspection..

The Atlanta FSDO Cabin Safety Inspector (CSI), on several occasions, observed the carrier's actual training classes during which the operation of the tailcone was taught. During these classes, both before and after the NASIP, all steps necessary for the operation of the tailcone exit in the event the tailcone slide fails to deploy were included. A video was shown to all flight attendants which demonstrated the technique to use if the slide fails to deploy.

During training, students are required to actually *perform* hands-on drills using a tailcone mock-up (training device). All drills are observed individually by VJ6A instructors, who were in turn, randomly observed by FAA Inspectors. In addition, students are each led individually into an actual tailcone on a static AirTran Airlines DC-9 aircraft and given additional training on the release of the tailcone and slide.

There is no specific training drill to include pulling of the strap on the slide cover should the slide fail to deploy, which is a step not included in the FAM. However, this technique is included in the training video and described again by instructors during hands-on drills.

Although AirTran Airlines continues to maintain its original procedures were correct, it agreed to issue Flight Attendant Manual Bulletin #32, issued 12/09/97 which contains additional operating procedures on page 16 of 84. Added is the following: "d) If slide fails to deploy, lift up on the red strap to remove slide housing and roll slide pack out. Pull red inflation handle."

Finding closed.

**1:03:02:** A review of the company manuals required by 14 CFR Part 121.133 revealed that:

1. The Airport Analysis Manual, page 1-13, contains information pertaining to JT8D-7 engines. The company does not operate JT8D-7 engines. This paragraph should reference JT8D-9 engines that are the type of engines that the company does operate.
2. The Aircraft Operating Manual contains references to the JT8D-7B engines on pages L-1-5 and L-1-6. The company does not operate JT8D-7B engines.
3. The Flight Operations Manual and the Flight Attendant Manual state that the company does not offer advance seat selection. However, the company is in the process of changing their aircraft from 115 seats to 106 seats and assign seat selections on the 106 seat aircraft.
4. A memorandum from the Director, System Operations Control, dated 10/2/97, and a Flight Operations Bulletin, dated 10/23/97, indicate that the maximum take-off weight of all the company's aircraft was 108,000 pounds. However, the DC-9-32 maximum weight chart on page L-1-3 of the aircraft operating manual was not revised to reflect the maximum take-off weight of 108,000 pounds for all company aircraft.
5. Page 2-2-20 of the Aircraft Operating Manual, dated 10/20/97, states that the aircraft will be in a stabilized configuration by 500 feet, Above Field Level (AFL) during a normal visual approach. Standard Practice 7345.5 contained in the Flight Operations Manual, dated 8/10/96, states that "A stabilized approach must be established by the following minimum altitudes: (a). In VMC conditions, by 1000 feet AFL."

Note: When this discrepancy between the two manuals was brought to the attention of the operator, a bulletin was immediately issued through the “Captains Read File” that the aircraft operating manual was correct, and that the hard copy bulletin would be issued to correct the flight operation manual.

6. Page 1-1-11, paragraph B, of the company’s Flight Operations Training Manual states that, “the following is a list of the Flight Safety International FAA approved Flight Simulation:” However, the 6<sup>th</sup> simulator on the list is a DC-9-30 Link/GMI simulator located in IAH (Houston, TX) that is actually operated by Continental Airlines.

Therefore, the operator is not in compliance with 14 CFR Part 121.133(a) in that the company manual was not kept current.

**CORRECTIVE ACTION:** The Atlanta FSDO investigated items 1, 2, 4, 5, and 6 of finding 1.03.02 and initiated Enforcement Investigation Report number (EIR) 98SO110053. Item #1 of the finding was corrected by revision #48 to the AirTran Airlines Airport Analysis Manual, dated November 1, 1997. Item numbers 2, 4, and 5 were corrected by revision #25 to the AirTran Airlines Airplane Operating Manual, dated January 1, 1998. Item #6 was corrected by revision #33 to the AirTran Airlines Flight Operations Training Manual.

Item #3 was corrected by the submission of a revision to SP 7510 (FAA approved exit row seating program) on January 22, 1998. EIR number 98SO110019 has been initiated.

Finding closed.

**1.03.03:** The Flight Attendant Manual provides the text of the announcements to be made throughout the flight.

A review of the Flight Attendant Manual determined the pre-takeoff oral passenger briefing does not contain a statement that Federal Law prohibits smoking in lavatories as required by 14 CFR Part 121.571(a)(1)(i).

**CORRECTIVE ACTION:** Also see Finding 1.07.01.

A follow up letter was sent by the Atlanta FSDO Cabin Safety Inspector to AirTran Airlines on November 28, 1997, indicating a specific prohibition against smoking *in the lavatories* should be added to the safety briefing to ensure compliance. Flight Attendant Manual Bulletin #32 was issued by AirTran Airlines on December 9, 1997, adding a more specific prohibition against smoking in the lavatories. Finding Closed.

**1.03.04:** The Flight Attendant Manual describes the policies and procedures the company has in place to ensure compliance and safe operations under normal and emergency conditions. The Flight Attendant Manual includes an emergency procedure that states “Customer without Seat (Aircraft Airborne Only) This position is used when a customer is relocated and there is not another seat available in the cabin.” The procedure further states that two (2) passengers should sit side by side and share one (1) seat belt using a seat belt extension. This procedure is contrary to 14 CFR Part 121.311(b).

Therefore, the company is not in compliance with 14 CFR Part 121.135(a)(4) in that the Flight Attendant Manual contains information that is contrary to an applicable Federal regulation.

**CORRECTIVE ACTION:** Personnel from Atlanta FSDO investigated Finding 1.03.04 and reviewed all applicable documentation. Subsequent inspections did not substantiate any non-compliance with the Federal Aviation Regulations or safe operating practices. This procedure exists only for in-flight emergencies and does not apply for dispatch purposes. The following applicable example is taken from the AirTran Airlines Flight Attendant Manual (FAM):

“Severe structural damage or relocation of customers away from smoke or a bomb might give rise to this circumstance.”

ValuJet / AirTran Airlines was requested to re-evaluate this specific practice and to submit supporting documentation of the procedure’s safety applicability. Additionally, a detailed account of the procedure’s training was included with the request. The airline responded that the stress factors of the existing seat belts and the aircraft seats had been researched to determine the potential restraint of an additional passenger seated in a row of three seats with the use of a seat belt extension. According to the carrier, this research validates the feasibility and safety of the procedure. The Atlanta FSDO agrees with AirTran Airlines that this procedure is satisfactory to be used to relocate passengers during an in-flight emergency.

Finding closed.

**1.03.05:** The Flight Attendant Manual states that “IOE time will be composed of a minimum of four segments of flying with the requirement that the trainee work the #1 position on at least one flight segment.”

14 CFR Part 121.434(e) requires that “a flight attendant must perform the assigned duties under supervision.” The regulation further states “Flight attendants receiving operating experience may not be assigned as a required crewmember.”

The company has a procedure that may cause non-compliance with an applicable Federal Aviation Regulation, and therefore, the procedure should be clarified to ensure that the trainee working the #1 position cannot be assigned as a required crewmember.

**CORRECTIVE ACTION:** A follow up letter was sent by the Atlanta FSDO Cabin Safety Inspector to AirTran Airlines on November 28, 1997. That letter directed a revision be made to the Flight Operations Training Manual (FOTM) adding the above prohibitions against (a) the assignment of an IOE flight attendant as a required crewmember, and (b) positioning the IOE flight attendant in a required flight attendant jumpseat position.

In response, AirTran Airlines has agreed to add the requested statements to the FOTM in Revision 37. The Atlanta FSDO is currently awaiting receipt of that revision.

Closure pending follow-up in accordance with the Atlanta FSDO’s action plan.

## **OPERATIONS TRAINING**

### **1.04**

#### **DESCRIPTION:**

AirTran Airlines operations training is contained in a manual entitled FAR 121 Flight Operations Training Manual. On September 15, 1997, all training in this manual was given extended initial approval until September 16, 1998.

Flight Safety International, Miami, FL, is authorized by Exemption 5408, as amended, to conduct all pilot training under the AirTran Flight Operation Training Manual, utilizing facilities and simulators in MIA, ATL, STL and IAH. The IAH simulator is operated by Continental Airlines. At present, AirTran Airlines check airmen are conducting some recurrent ground and flight training.

Flight Attendant training is conducted entirely in-house at 17604 Phoenix Parkway, Atlanta, GA. The program consists of basic indoctrination, aircraft ground training, emergency training, recurrent training and Air Transportation supervisor training.

The dispatcher training program is conducted under a contract by TransCon of Euless, Texas. The program consists of basic indoctrination, initial ground training, recurrent ground training, Air Transportation supervisor training, and dispatcher qualification.

All training records are maintained at the company headquarters at 1800 Phoenix Blvd., Atlanta, GA.

*FSDO Note: FOTM extended approval - Atlanta FSDO granted "initial approval" during certification in 1993. As a result of the rapid growth of the carrier and corresponding program changes requiring re-evaluation of the issues during the 1994 - 95 time frame, the "initial approval" was extended to facilitate the FAA's needs to evaluate the unique mix of DC-9 equipment being introduced and utilized by the airline.*

*Following the 1996 suspension of service, the carrier initiated an almost complete recertification with only one type of DC-9 operating. Simultaneously, an Aircrew Designated Examiner (ADE) program was being implemented within the airline. Initial approval was again extended to provide the FAA's Aircrew Program Manager (APM) an opportunity review and accept the program.*

**INSPECTION DATA:**

The Flight Operations Training Manual and each training program were reviewed for compliance with the appropriate regulations and the company's Operations Specifications.

Pilot ground and flight training classes were monitored, as well as flight attendant ground training. In addition, several proficiency checks and line checks were observed.

**FINDINGS:**

**1.04.01:** 14 CFR Part 121.415(a)(1) requires a ground training program that provides 40 hours of basic indoctrination ground training for newly hired crewmembers.

A review of the company's flight attendant basic indoctrination ground training program contained in the approved Flight Operations Training Manual revealed that it included some specific training modules, such as Crew Resource Management and Security, that are not applicable to basic indoctrination training.

In addition to the Flight Operations Training Manual, the company produced an unapproved training document entitled "Flight Attendant Initial Training Agenda" that detailed the Curriculum Segments by subject and the training time allotted to each segment. The training time allotted to basic indoctrination totaled 43 hours. However, some of the subjects contained in this document, such as "Company Physical", "Uniform and Grooming", "Uniform and Grooming Quiz", "ID Pictures/Uniform Fitting" and "Benefits, Insurance, and New Employee Form" do not meet the requirements of 14 CFR Part 121.415 (a)(1) and guidance of HBAT 94-10.

Subsequently, the training hours allotted to these subjects cannot be counted towards the 40 programmed hours requirement of basic indoctrination ground training.

Therefore, the company is not in compliance with 14 CFR Part 121.415(a)(1) in that the approved flight attendant basic indoctrination ground training program, as contained in the approved Flight Operation Training Manual, and as detailed in the "Flight Attendant Initial Training Agenda," does not include 40 hours of programmed instruction.

Note: It should be noted that when this matter was brought to the attention of the company, the company reviewed the two documents referenced above, along with their daily lesson plans, and revised their "Flight Attendant Initial Training Agenda." The revised document was given to the CHDO for their review and evaluation.

**CORRECTIVE ACTION:** A review by the Atlanta FSDO Cabin Safety Inspector of the "Flight Attendant Initial Training Agenda", lesson plans, scripts, and other documents used by AirTran Airlines instructors, showed the initial ground training contained all of the subjects and hourly requirements of the applicable regulations, FAA Guidance, HBAT 94-10, and the carrier's approved FOTM. CRM (Crew Resource Management) was moved to Initial Ground Training (IGT). After inspection, no violation was discovered (sufficient time for Basic Indoctrination was allotted even with CRM included).

The review was followed by surveillance by the Atlanta FSDO Cabin Safety Inspector of a complete F/A Initial training class (Class 97-13). The unofficial form that the NASIP Inspector saw, may have been misleading.

However, after a thorough review of the above documents and surveillance of the training class, the Atlanta FSDO Cabin Safety Inspector confirmed that 40 hours of basic indoctrination (and the subjects mandated by the FAR's) were actually being provided resulting in no violation of Federal Aviation Regulations.

To clarify the compliance, a new and more detailed "Flight Attendant Training Agenda", developed by AirTran Airlines and reviewed by the Atlanta FSDO Cabin Safety Inspector, is currently being used by the carrier. The changes incorporated in the revised agenda clarify the apportionment of time in each subject area addressed by the NASIP team. 40 hours of Basic Indoctrination Training is required by the FAR's. The AirTran program now provides 42:00 hours. (2:00 hours more than required.).

Finding closed.

**1.04.02:** 14 CFR Part 121.421(c)(2) requires a Flight Attendant Ground Training Program that provides at least 16 hours of initial ground training.

A review of the company's initial ground training program contained in the approved Flight Operations Training Manual and the "Flight Attendant Initial Training Agenda" revealed that the training times contained in the "Flight Attendant Initial Training Agenda for initial ground training totaled 20 hours. However, some of the subjects being taught in this syllabus, such as "Policies and Procedures", "Flight Routine Day - Beginning to End", "FAM Flights", "Inflight Service", and "Forms Workshop", do not meet the requirements of 14 CFR Part 121.421(a).

Subsequently, the training hours allotted to these subjects cannot be counted towards the 16 hours requirement.

Therefore, the company is not in compliance with 14 CFR Part 121.421(c)(2) in that the flight attendant initial ground training program does not include 16 hours of programmed instructions.

Note: It should be noted that when this matter was brought to the attention of the company, the company reviewed the two documents referenced above, along with their daily lesson plans, and revised their "Flight Attendant Initial Training Agenda." The revised document was given to the CHDO for their review and evaluation.

**CORRECTIVE ACTION:** A review by the Atlanta FSDO Cabin Safety Inspector of the "Flight Attendant Initial Training Agenda", lesson plans, scripts, and other documents used by AirTran Airlines instructors, showed the initial ground training contained all the subjects and hourly requirements of the applicable regulations, FAA guidance, HBA 94-10, and the carrier's approved FOTM.

The review was followed by surveillance by the Atlanta FSDO Cabin Safety Inspector of a complete F/A Initial training class (Class 97013). The unofficial form that the NASIP Inspector evaluated, may have been misleading. However, after completing her review of the above documents and surveillance of the training class, the Atlanta FSDO Cabin Safety Inspector found 16 hours of initial ground training subjects being provided. Thus, no violation of Federal Aviation Regulations was confirmed.

A new and more detailed "Flight Attendant Training Agenda", developed by AirTran Airlines and reviewed in detail by the Atlanta FSDO Cabin Safety Inspector, is currently being used by the carrier. The changes incorporated in the revised agenda clarify the apportionment of time in each subject area questioned in the NASIP. 16 hours of training in Initial Ground Training is required by the FAR's, and the AirTran program provides 20:45 hours. (4:45 hours more than required.).

Finding closed.

**1.04.03:** A review of an individual pilot's training folder revealed that he had accomplished a "Power Back" maneuver during a proficiency check conducted in a "Level A" visual simulator. A "Level A" simulator usually lacks the "ground dynamic characteristics of the aircraft being simulated" as opposed to a "Level B, C, or D" simulator that does possess these characteristics. In addition, the "Level A" simulator used for training and checking in ATL does not have visual capabilities to display the aircraft at a gate.

Therefore, the operator is accomplishing a proficiency check maneuver in a level of simulator whose ground characteristics may not fully support such a maneuver and whose visual capabilities cannot display the aircraft being powered back from a gate.

Furthermore, the operator is checking the "Power Back" maneuver during the line check accomplished aboard the aircraft. However, the operator is not recording or documenting the accomplishment of this maneuver on the line check form.

Therefore, the operator does not have a procedure to ensure that the simulator they are using has the ground and visual characteristics to fully support a "power back" maneuver, nor does the operator have a procedure to record and document the maneuver when it is accomplished aboard an aircraft during a line check.

**CORRECTIVE ACTION:** The ATL FSDO investigated finding 1.04.03. Level A Simulators are approved for powerback training (FAA Order 8400.10, page 3-272). The powerback maneuver accomplished by AirTran Airlines during simulator proficiency checks is not evaluated, but is used to enhance the real time nature of the proficiency check and position the aircraft for the taxi phase of the check which is evaluated. Powerback training is not specifically required in either Appendix E or F of Part 121. However, since the powerback maneuver is used extensively by AirTran Airlines, the company evaluates the maneuver during initial and annual line checks. Previously, during line checks, the company graded powerback as part of the taxi maneuver. In order to avoid any future confusion, the company has revised the line check evaluation form to clearly identify the powerback maneuver as distinct from pushback or normal taxi maneuvers. The corrective action was coordinated with the FAA's Air Carrier Training Branch (AFS-210) to ensure that the operator's practice was in conformance with FAA policy.

Finding closed.

**1.04.04:** A review of the company's Flight Operations Training Manual revealed that it was not current in that:

1. Several pages of the training manual refer to "FAR 61, Appendix A". 14 CFR Part 61 was revised in August of 1997 and no longer contains an Appendix A.
2. The list of effective pages contained in the training manual did not include pages 1-9-9, 1-9-10, and 1-9-11.
3. Page 1-9-2 of the training manual indicates that the manual contains an aircraft dispatcher differences training curriculum. A review of the manual revealed that the training program does not contain an aircraft dispatchers differences training curriculum. The differences curriculum originally addressed the differences for MD-80 aircraft, but was removed from the manual when the company stopped flying MD-80 aircraft.

Therefore, the company is not in compliance with 14 CFR Part 121.133(a) in that it failed to keep the Flight Operations Training Manual current.

**CORRECTIVE ACTION:** Operator was notified of the discovered discrepancies in the Flight Operations Training Manual (FOTM) by letter of December 11, 1997.

1. Revisions 35 and 36 eliminate all references to "FAR 61, Appendix A" in the FOTM.
2. Revision 31 to the FOTM included a List of Effective Pages including 1-9-9, 1-9-10, and 1-9-10.
3. Revision 33 to the FOTM removed reference to MD-80 Differences Training for dispatchers.

AirTran Airlines FOTM will be, with these revisions in place, in compliance. Closure pending follow-up in accordance with the Atlanta FSDO's action plan.

**1.04.05:** A review of the company's Flight Operations Training Manual revealed that the list of simulators approved under 14 CFR Part 121.407 did not have approvals for particular maneuvers, procedures, or functions. This is contrary to 14 CFR Part 121.403(b)(4).

**CORRECTIVE ACTION:** At the time of the NASIP inspection, the approved list of simulators was contained on page 1-1-11 of the AirTran Airlines Flight Operations Training Manual (FOTM). A review of *only* this page validates the NASIP finding that the maneuvers, procedures, and functions are not listed after each simulator. However, a further review of the FOTM discloses that the functions listed in the finding are described on pages 2-3-79 through 2-3-103 of the FOTM.

Each of the maneuvers, procedures and functions listed in pages 2-3-79 through 2-3-103 of the FOTM are approved by the Principal Operations Inspector (POI) for the simulators listed on page 1-1-11.

Finding closed.

**1.04.06:** The operator does not have procedures or approved forms to ensure that training and qualifying events are documented in a standardized and complete manner as appropriate to 14 CFR Part 121.683(a)(1).

**CORRECTIVE ACTION:** At the time of the NASIP inspection, AirTran Airlines had forms and procedures to document training and qualifications. These forms are not required to be FAA approved. To ensure standardization, the company has agreed to include the forms and procedures in the FOTM. Revision 35 to the FOTM was approved by the Atlanta FSDO on January 1, 1998.

Finding closed.

**1.04.07:** A review of the company's Flight Operations Training Manual revealed that the recurrent ground training curriculum had been reduced from 25 to 24 hours.

When a reduction of programmed hours of training is granted, the administrator provides the certificate holder with a statement of the basis for the approval in accordance with 14 CFR Part 121.405(d). However, the operator did not have a copy of the statement from the administrator pertaining to the reduction of the hours for recurrent ground training. Therefore, the operator is not in compliance with 14 CFR Part 121.403(b)(6).

**CORRECTIVE ACTION:** A review of the FSDO files disclosed that a letter approving the reductions was mailed to AirTran Airlines on October 10, 1997. An additional copy of that letter has been provided to the operator.

Finding closed.

**1.04.08:** 14 CFR Part 121.415(a)(1) requires a ground training program that provides 40 hours of basic indoctrination ground training for newly hired crewmembers. A review of the company's basic indoctrination ground training program for flight crews and dispatchers contained in the approved Flight Operations Training Manual revealed that it includes such subjects as "Initial Security" and "Ground De-icing/Anti-icing Procedures" that do not meet the requirements of 14 CFR Parts 121.415(a)(1), 121.629(c)(2) and guidance of HBA 94-10.

Therefore, the company is not in compliance with 14 CFR Part 121.415(a)(1) in that the basic indoctrination training program, as contained in the Flight Operations Training Manual, contains subject material not applicable to basic indoctrination training.

**CORRECTIVE ACTION:** The Atlanta FSDO investigated finding 1.04.08. The investigation determined that AirTran Airlines provides 40 hours of Basic Indoctrination training in at least the subjects required by 121.415(a)(1). In response to this finding, AirTran Airlines submitted revision #36, dated January 20, 1998, to the Flight Operations Training Manual.

This revision deletes the Hijacking and Unusual Situations module of the Initial Security curriculum segment from the Basic Indoctrination curriculum segment. This security module is now included in the Emergency Situation curriculum segments for General Emergency training. Revision #36 also deletes the Winter Operations module from the Basic Indoctrination curriculum segment. Training for this module is actually conducted during the DC-9 Ground Training General Operational curriculum segment as approved in the FOTM. The Atlanta FSDO is awaiting receipt of revision #36.

Closure pending follow-up in accordance with the Atlanta FSDO's action plan.

**1.04.09:** Page 1-1-16 of the company's flight Operations Training Manual states that "Instructors employed by TransCon must meet the prerequisite qualifications as outlined in Exemption No. 5408". However, a review of Exemption No. 5408 revealed that it is not applicable to training done by TransCon or its instructors.

Therefore, the company is not in compliance with 14 CFR Part 121.135(a)(4) in that the manual contains information contrary to the company's Operations Specifications.

**CORRECTIVE ACTION:** The Atlanta Flight Standards District Office investigated finding 1.04.09. There are no special FAR requirements for Dispatcher Instructors other than that they hold a valid Dispatcher Certificate and have been trained in the operators procedures. The TransCon instructors met all of these requirements and were therefore fully qualified. "Exemption 5408" was referenced in error. It applied to the Flight Safety, Pilot Instructors and not to the TransCon Dispatcher Instructors. The operator removed the discrepant statement from the FOTM in Revision #33 on November 15, 1997.

Finding closed.

**1.04.10:** Page 2-3-16 of the company's Flight Operations Training Manual states, "All captains who are on "High Minimums" will be accompanied by an AirTran Line Check Airman on their first flight aboard "a "930" series aircraft". However, the company does not have a written procedure or form to ensure that this company policy is accomplished.

**CORRECTIVE ACTION:** The Atlanta FSDO investigated finding 1.04.10. Training is conducted for this procedure as part of the Training Policy and Procedures module of the approved Check Airman/Instructor ground training curriculum segment.

This module is located on page 1-8-16 of the AirTran Airlines Flight Operations Training Manual. Accomplishment of this procedure is documented by the Check Airman marking the Variant Aircraft box on the Initial Operating Experience form, dated 2-28-95.

Finding closed.

**1.04.11:** The company's Flight Operation Training Manual contains an approved initial ground training program consisting of 120 programmed hours of instruction in accordance with 14 CFR Part 121.419(b)(2). The initial ground training program also includes a copy of a statement from the administrator reducing the programmed hours of instruction from 120 hours to 80 hours in accordance with 14 CFR Part 121.403(b)(6) and 121.405(d).

According to the Principal Operations Inspector and Aircrew Program Manager, the intent of the letter containing this statement was to provide the reduction of programmed hours for only a select group of pilots who had previously completed most of their ground and flight training prior to the company's shutdown in June of 1996.

However, the Director of Training stated that the request for the reduction of hours was based upon the fact that the pilots in this class had completed various amounts of training prior to the company's shutdown in June of 1996, but, all had completed at least the Basic Indoctrination portion of their ground training. Therefore, since their Basic Indoctrination ground training equaled 40 hours, a request to reduce initial ground training by 40 hours was submitted to the Administrator.

It must be noted that Basic Indoctrination is not part of the required initial ground training curriculum required by 14 CFR Part 121.419 and therefore, does not constitute a basis for a reduction of initial training hours under 14 CFR Part 121.405(d).

**CORRECTIVE ACTION:** The ATL FSDO investigated finding 1.04.11. On October 9, 1997 an approval letter was written by the Atlanta FSDO which authorized a reduction from 120 to 80 hours of Initial New Hire DC-9 Ground Training for one "Recall" class (for class beginning training of October 13, 1997) in accordance with 121.405(d) and guidance in FAA Order 8400.10. The pilots in this class had previously completed all Basic Indoctrination, DC-9 Initial Ground Training and Flight Training, with the exception of Initial Operating Experience (IOE) Training prior to being furloughed. The FAA, Aircrew Program Manager (APM) for AirTran Airlines had gone through the complete training program with the company prior to the pilot furlough. Because of the observation of the previous training by the APM, the POI authorized the reduction of the DC-9 ground training. The completion of Basic Indoctrination Training was not used as the basis for the reduction of DC-9 training. AirTran Airlines Director of Training's statement was misunderstood by the NASIP inspector.

Finding closed.

**1.04.12:** The company has a Check Airman Handbook that is not part of the approved Flight Operations Training Manual. The handbook contains guidance for check airmen pertaining to the training, checking and qualifying events required by 14 CFR Part 121, subparts N and O. Neither the approved Flight Operations Training Manual nor the unapproved Check Airman Handbook contains a procedure to ensure that the records pertaining to training and checking events are completed in a uniform and standardized manner, particularly concerning an unsuccessful proficiency check that involves additional training and a re-check.

**CORRECTIVE ACTION:** Upon review of the Flight Operations Training Manual (FOTM), the Atlanta FSDO discovered that the modules containing the referenced procedures were included on pages 1-8-16 and 1-8-17. Instruction related to these procedures is conducted during check airman ground training. Additionally, the Check Airman Handbook, a manual not requiring FAA approval, was reviewed by the Atlanta FSDO and found to be adequate for providing guidance to Check Airman for conducting training and checking.

Finding closed.

**1.04.13:** The company has an approved Flight Operations Training Manual that contains the training curriculums required by 14 CFR Part 121 Subpart N, including the associated modules and elements.

The Flight Operations Training Manual does not contain the individual lesson plans for these modules that the company is presently utilizing for the actual instruction. It should be noted that they are not required to do so. However, a comparison of the curriculums in the Flight Operations Training Manual and the training syllabuses revealed that some of the actual instruction being given does not directly correspond to the approved training curriculums.

Therefore, the company does not have a procedure to ensure that the individual lesson plans correspond to the approved training modules or meet the applicable training requirement.

**CORRECTIVE ACTION:** Inasmuch as the ATL FSDO has a complete set of VJ6A Pilot Training Lesson Plans, this finding applies only to Flight Attendant training. Following the NASIP, the Atlanta FSDO Cabin Safety Inspector conducted a review of AirTran Airlines lesson plans and syllabuses used during initial flight attendant training, and attended a complete flight attendant training course. A comparison between the Flight Operations Training Manual and documents used by the instructors during training showed the actual training being conducted did correspond to the approved training curriculum. All elements contained in the approved training curriculum were included in actual instruction.

Finding closed.

**1.04.14:** 14 CFR Part 121 Appendix F, I (b) requires that a "Preflight Inspection" during which "The pilot must conduct an actual visual inspection of the exterior and interior of the airplane." The regulation further states "an approved pictorial means that realistically portrays the location and detail of preflight inspection items and provides for the portrayal of abnormal conditions may be substituted for the preflight inspection."

The company is currently using a photo album that contains 21 photographs of one of their DC-9-32 aircraft as a pictorial means for a substitution of the preflight inspection. The photographs were taken from various spots around the perimeter of the aircraft.

A review of the Flight Operations Training Manual and an interview with the Director of Training revealed that the company does not have written approval from the Administrator to use the photo album as a pictorial means.

Further discussions with the Director of Training and the Aircrew Program Manager revealed that both men believed that the company did have “verbal” approval to use the photo album as a pictorial means.

Therefore, the company is not in compliance with 14 CFR Part 121 Appendix F, I (b) in that the company is not using an actual airplane or approved pictorial means to satisfy the “Preflight Inspection” requirement.

**CORRECTIVE ACTION:** The FAA’s Aircrew Program Manager (APM), after conferring with the Principal Operations Inspector (POI), provided verbal approval on October 8, 1997 for AirTran Airlines to initiate the use of a “photo album” to satisfy the Federal Aviation Regulations’ Appendix F preflight inspection requirements while conducting oral examinations. The POI issued a Letter of Approval on November 5, 1997 authorizing the use of this photo album to fulfill the requirements of FAR 121, Appendix F. AirTran Airlines did not use the photo album to satisfy the preflight inspection requirements of an oral examination prior to the APM’s verbal approval.

Also, since the recurrent pilot in command (PC) check flights are given in a Level A simulator, two additional landings must be observed in the actual aircraft. These are accomplished during the subsequent “Line Check” which follows the simulator portion of the check. Additionally, an external preflight inspection is evaluated prior to that flight.

Finding closed.

**1.04.15:** On 11/1/97, a company check airman administered a proficiency check to a First Officer using the Level A simulator at Flight Safety, Atlanta, GA. A FAA Inspector observed the oral and flight portion of the proficiency check, and completed an Inspector’s Statement detailing the conduct and results of the proficiency check.

A review of the Proficiency Check Report and the associated Training Record for this check ride that were completed by the check airman who had conducted the proficiency check revealed:

1. That only the additional training for the “V1 cut” and the “raw data ILS” were recorded on the airman’s Training Record. The additional training for abnormal procedures (“hung starts” and “cross tie lock outs”) were not recorded on the airman’s Training Record.
2. That the maneuver “steep turns” was graded as “S” but this maneuver was not accomplished during the proficiency check.
3. That the “Preflight Inspection” was graded as “S” but this maneuver was not accomplished during the proficiency check.

Therefore, the check airman violated 14 CFR Part 61.59(a)(2) in that he made a fraudulent entry on a record used to show compliance.

**CORRECTIVE ACTION:**

1. The ATL FSDO investigated finding 1.04.15. During the simulator period in question, the “V1 cut” and “Raw Data ILS” maneuvers were the only unsatisfactory maneuvers observed by the Check Airman.

Additional training on each of these maneuvers was accomplished and documented in accordance with AirTran Airlines procedures and the guidance found in FAA Order 8400.10. The “hung start” and “cross-tie lockout” abnormal procedures were not “unsatisfactory” and did not require additional training, checking, or documentation.

Apparently, the Inspector believed the Check Airman was providing additional training for the “hung start” abnormal procedure. In fact, the Check Airman was demonstrating how the engine would overheat if a crew failed to notice a “hung start.” This explanation is consistent with this check airman’s check profiles as observed previously by the APM. Although the pilot’s execution of the “generator fails and cross-tie lockout” abnormal procedure could have been more efficient, the Check Airman indicated that the maneuver was not unsatisfactory.

Additionally, the Check Airman states that he offered expanded information related to this abnormal procedure after the examinee had successfully stabilized the situation and completed the abnormal checklist. Again, the NASIP inspector was evidently under the impression that additional training for an *unsatisfactory* event was occurring, when, in fact, the Check Airman was providing enhanced information related to the abnormal procedure.

2. “Steep turns” are not required to be evaluated on SIC (second-in-command) recurrent proficiency checks. When entering “NE” (not evaluated) for “Steep turns”, the computer was programmed to default to “S”. The Check Airman failed to notice the defaulted entry, and subsequently, the “S” grade was noticed by the Inspector. We confirmed that this computer default problem existed when making “NE” and “W” entries. The company has corrected this problem by taking out all defaults related to training and checking forms.

3. “Preflight Inspection” was appropriately graded “S” for the *cockpit preflight* which was performed in the simulator.

**Summary:** The Atlanta FSDO conducted a satisfactory follow-up Check Airman observation on this Check Airman. The investigation produced no evidence that falsification, fraud, or FAR violations occurred during this simulator evaluation.

Finding closed.

**1.04.16:** The company does not have a procedure to ensure that daily preflights are conducted of their approved simulators and discrepancies are entered at the end of training and checking as required by 14 CFR Part 121.407(a)(4)(5).

**CORRECTIVE ACTION:** The Atlanta FSDO investigated finding 1.04.16. AirTran Airlines has a long term contract with Flight Safety International for the use of three DC-9 simulators. A letter from Flight Safety International, dated October 21, 1997, indicates that each simulator receives a daily functional preflight check before being used and that a daily discrepancy log is available for check airman or instructor use. AirTran Airlines Check Airmen and instructors receive approved training on the procedures to be used in order to comply with 121.407(a)(4)(5). (FOTM, page 1-8-20, 3. Check Airman/Instructor Duties and Responsibilities) On January 15, 1998, the Atlanta FSDO confirmed that the referenced procedures are being used.

Finding closed.

**CREWMEMBER AND DISPATCHER QUALIFICATION****1.05****DESCRIPTION:**

AirTran Airlines assures that crewmembers have the knowledge and skills required through a system of training, checking and record keeping. Training and qualification records include the requirements of the Federal Aviation Regulations, hazardous materials recognition, required pilot certificates, recency of experience, line/proficiency checks, and initial operating experience. Training records are maintained and available at AirTran Airlines headquarters, 1800 Phoenix Blvd., Suite 126, Atlanta, GA.

**INSPECTION DATA:**

The Flight Crew and Dispatcher Qualification records were inspected for compliance with appropriate 14 CFR Part 121 regulations.

**FINDINGS:**

None.

**DUTY/FLIGHT TIME LIMITATIONS & REST REQUIREMENT****1.06****DESCRIPTION:**

AirTran Airlines maintains a crew scheduling department using a manager of crew resources and scheduling clerks to schedule flight crews. The company uses hand written forms in file folders to record and update flight, duty, and rest time for its pilots and dispatchers. These records are stored in file folders at the company facility where crew scheduling is located. The company uses flight time and rest requirements of 14 CFR Parts 121.465, 121.471, 121.503, 121.505 and 121.515.

The company does not use the same flight time and rest requirement for their flight attendants that they use for their pilots. Instead, the company has elected to comply with 14 CFR Part 121.467 for their flight attendants.

**INSPECTION DATA:**

Flight and rest requirement records of the pilots, flight attendants and dispatchers were inspected to determine compliance with the appropriate Federal Aviation Regulations.

**FINDINGS:**

**1.06.01:** A review of the operator's crewmember rest and flight time records revealed that several crewmembers had not completed their individual records in accordance with the instructions contained in the company flight operation manual. Therefore, due to incomplete entries on these records it was not possible to determine if the individual crewmember had received his or her required rest period. Therefore, the company is not in compliance with 14 CFR Part 121.683(a)(1).

**CORRECTIVE ACTION:** Certificate Holder was notified of this discrepancy by letter of December 11, 1997. AirTran Airlines issued Pilot Bulletin #97-20 re-emphasizing the procedures outlined in Standard Practice 7014. Also, the specified discrepant pilot records were corrected by using information contained in the pilots' personal log books. Finally, Computer Crew Record Keeping System, satisfying the requirements of 14 CFR 121.683(a)(1) was approved by the Principal Operations Inspector and implemented by operator on January 12, 1998. The issue is being investigated under Enforcement Investigation Report (EIR) # 98SO110041.

Finding closed.

**1.06.02:** A review of the operator's crewmember rest and flight time records revealed that one crewmember did not use the proper form format that is described in the company Flight Operations Manual. Instead, the crewmember used a form from his previous employer.

Therefore, this crewmember's record was not completed in compliance with the procedures contained in the Flight Operations Manual for completing flight/duty time and rest records.

**CORRECTIVE ACTION:** Operator was notified of this discrepancy by letter of December 11, 1997. Investigation confirmed that the subject pilot had utilized his personally designed form in place of the operator's form as directed in the company's Standard Practice 7014. Operator issued Pilot Bulletin #97-20 re-emphasizing the procedures outlined in Standard Practice 7014. Also, the specified discrepant pilot records were corrected by pilot using information contained in personal log books. Finally, Computer Crew Record Keeping System, satisfying the requirements of 14 CFR 121.683(a)(1) was approved by the Principal Operations Inspector and implemented by operator on January 12, 1998. The issue is being investigated under Enforcement Investigation Report (EIR) 98SO110041. Finding closed.

**1.06.03:** The company records flight attendant duty and rest information by using a separate sheet of paper for each month. These individual monthly sheets are contained in a folder bearing the flight attendant's name and employee number.

The individual monthly sheets do not, however, bear the flight attendant's name or employee number. Therefore, it is impossible to tell from looking at an individual monthly sheet whose monthly sheet it is.

Therefore, the company does not have a procedure to ensure that flight attendants duty and rest records are in compliance with 14 CFR Part 121.683(a).

**CORRECTIVE ACTION:** Certificate Holder was notified of this discrepancy by letter of December 11, 1997. To correct the discrepancy, the airline:

1. Revised Flight Attendant Crew Duty and Rest Form and reemphasized the necessity of maintaining complete information to all personnel involved with flight attendant record keeping,
2. Corrected all previous forms to include name and employee number on each sheet. Changes were verified by surveillance from Assistant Principal Operations Inspector.
3. Submitted to FAA and received approval for a Computer Crew Record Keeping System, satisfying the requirements of 14 CFR 121.683(a)(1) was approved by the Principal Operations Inspector and implemented by operator on January 12, 1998.

The issued is being investigated under Enforcement Investigation Report (EIR) 98SO-110041.

Finding closed.

## **FLIGHT OPERATIONS**

### **1.07**

#### **DESCRIPTION:**

The company's Operations Specifications authorize AirTran Airlines to operate McDonnell Douglas DC-9-32 aircraft as an Air Carrier, conducting common carriage operations in accordance with the rules governing domestic and supplemental operations. Flight crews are based in Atlanta, GA. Operational control is maintained through the dispatch center at the principal base of operations at Atlanta, GA.

The majority of the flights operate under 14 CFR Part 121 domestic regulations and operate as a "hub and spoke" system from Atlanta, GA.

The company employs approximately 200 pilots domiciled in Atlanta, GA, and approximately 327 flight attendants domiciled in Atlanta, GA (ATL) (295) and Washington, DC (IAD) (32).

#### **INSPECTION DATA:**

Enroutes and ramp checks were conducted during which required crew member certificates, applicable manuals and other operations documents were inspected.

#### **FINDINGS:**

**1.07.01:** An enroute inspection aboard AirTran Flight 299, Boston, MA to Atlanta, GA, on 10/26/97, aircraft N936VV, revealed that the flight attendant's oral briefing did not include a statement that "Federal Law Prohibits Smoking in Lavatories" as required by 14 CFR Part 121.571(a)(1)(i).

**CORRECTIVE ACTION:** (Also see Finding 01.03.03.) Atlanta FSDO inspectors investigated this finding. Prior to the NASIP inspection, AirTran Airlines stated in their cabin announcements that smoking was prohibited throughout the entire aircraft. Additionally, no smoking placards and decals were conspicuously mounted inside the interior of all aircraft lavatories. A follow up letter was sent by the Atlanta FSDO to AirTran Airlines November 28, 1997, indicating a specific prohibition against smoking *in the lavatories* should be added to the safety briefing to ensure compliance. Flight Attendant Manual Bulletin # 32 was issued by AirTran Airlines on December 9, 1997, adding a more specific prohibition against smoking in the lavatories.

Finding closed.

**1:07:02:** The company is in the process of changing the seating configuration of their aircraft from 115 passenger seats to 106 passenger seats. This configuration change also causes the Basic Operating Weight and the “Index Units” of the aircraft to change.

The company is re-calculating a new Basic Operating Weight and new “Index Units” for each aircraft when the passenger seat configuration is made for that aircraft.

The Basic Operating Weight and “Index Units” for each aircraft are made available to flight crews by an “Aircraft Weights” table in the Flight Operations Manual. This data is used by flight crews to compute a weight and balance manually.

On 10/22/97, the company put civil aircraft N946VV, company aircraft #946, into 14 CFR Part 121 revenue service immediately after the passenger seat configuration had been made to that aircraft. The company failed, however, to update the “Aircraft Weights” table or to issue an “Operations Bulletin” with the new Basic Operating Weight and “Index Units” for that aircraft. Since the flight crew was not provided with an up-dated and accurate Basic Operating Weight and “Index Units” for that aircraft, the weight and balance completed manually for this flight was inaccurate.

14 CFR Part 121.665 states “Each certificate holder is responsible for the preparation and accuracy of a load manifest form before each take-off.”

Therefore, the company is not in compliance with 14 CFR Part 121.693(c)(d) in that the load manifest for this flight did not have an accurate total weight computed under approved procedures nor did it have accurate evidence that the aircraft was loaded according to an approved schedule that insures that the center of gravity was within approved limits.

Note: It should be noted that when this matter was brought to the attention of the company, the engineering department immediately issued an Operations Bulletin to correct the Basic Operating Weight and “Index Units” for this aircraft.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated Finding 1.07.02 and found that personnel in the AirTran Airlines Engineering Department completed the calculations for the new weight when they came to work on the morning of October 27, 1997. It was then provided to all flight crewmembers and the dispatch office prior to the next flight. This incident is being investigated as EIR 98SO110044.

Finding closed.

**1:07:03:** During an enroute inspection aboard AirTran Flight 131, from Atlanta, GA to Fort Lauderdale, FL, on 10/25/97, the FAA Airworthiness Inspector who was occupying the cockpit jumpseat, observed the oil pressure for the #1 (left) engine rise to 60 PSI and fluctuate during the climb out from Atlanta, GA. The inspector brought this matter to the attention of the pilot-in-command after the aircraft climbed through 10,000 feet.

Upon arrival in Fort Lauderdale, FL, the inspector deplaned the aircraft. The pilot-in-command subsequently operated AirTran Flight 140, Fort Lauderdale, FL back to Atlanta, GA, utilizing the same aircraft.

A review of the aircraft logbook revealed that a discrepancy report had been entered on page 51208 relative to the oil pressure reaching 60 PSI. The write up states “#1 oil pressure gage gets to 60 PSI on takeoff and drops to 52 PSI after reduction.”

It should be noted that the DC-9-32 has an oil pressure operating limitation of 55 PSI.

Therefore, the pilot-in-command violated 14 CFR Part 91.9(a) in that he operated a civil aircraft without complying with the operating limitations specified in the approved Airplane Flight Manual, markings, and placards by operating the aircraft with an oil pressure above 55 PSI.

**CORRECTIVE ACTION:** The ATL FSDO investigated finding 1.07.03 by initiating EIR #98SO110012 and EIR #98SO110013. In view of the potential critical issues related to this finding, an experienced team of three current and qualified DC-9 FAA Air Carrier Operations Inspectors, plus one additional DC-9 qualified Air Carrier Airworthiness Inspector investigated and reviewed the evidence for this case. During the course of this investigation, significant essential points as stated by the NASIP team inspector were added, changed, or revised. At the completion of this investigation, a consensus of the Inspectors agreed that “a preponderance of evidence” did not indicate a violation of the Federal Aviation Regulations had occurred. Additionally, this team solicited legal counsel from the FAA’s Southern Region (ASO-7) to discuss the specifics of the case and their findings. Ultimately this working group (including legal counsel) concluded that a preponderance of the evidence supported the flight crew’s statements. The discovered evidence, along with specific conflicts in the NASIP Inspector’s statements, did not indicate that a safety of flight issue existed or a flight crew violation of the FAR’s had occurred. Therefore, the EIR’s were closed with “No Action”.

Finding closed.

**1.07.04:** 14 CFR Part 91.413(b) requires that an ATC transponder specified in 121.345(c) that has maintenance performed on it must be tested, inspected and found to comply with paragraph (c), appendix E of Part 43.

Since April, 1997, the company has had seven (7) aircraft that have undergone a “C” check that requires the transponder be removed, have maintenance performed on it, and be re-installed into the aircraft. The transponders for these seven aircraft were not, however, tested, inspected and found to comply with paragraph (c), appendix E of Part 43.

Therefore, the company is not in compliance with 14 CFR 91.413(a)(b) in that the company used an ATC transponder specified in 121.345(c) when it had not been tested, inspected and found to comply with paragraph (c), Appendix E, or Part 43.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 1.07.04 and reviewed all appropriate documentation. AirTran Airlines’ C check cards do not require removal of the transponder. Therefore the requirements of Appendix E to 14 CFR 43 do not apply. We were unable to substantiate the finding.

During investigation of this finding we discovered that AirTran Airlines had removed transponders on the line and had not complied with the applicable provisions of Appendix E. Enforcement Investigative Report 98SO110051 was filed.

Finding closed.

**FLIGHT CONTROL****1.08****DESCRIPTION:**

AirTran Airlines Dispatch and Flight Control are located at 1800 Phoenix Blvd., Suite 126, Atlanta, GA. The office area encompasses approximately 4000 square feet, and is the only facility used for control of their domestic and supplemental operations. At present, there is one (1) manager, ten (10) dispatchers, and three (3) customer service representatives.

Enroute and terminal weather are obtained from Jeppeson Inc., Kavouras Inc., Weather Services International and the National Weather Service. All load manifests and dispatch releases are maintained at each individual station for 3 months. The certificate holder uses a Federal Aviation Administration (FAA) approved computer system for all flight planning, weather dissemination and dispatching.

**INSPECTION DATA:**

Dispatch releases and load manifests were inspected for compliance with 14 CFR Part 121. All applicable manuals were inspected for currency. The communications and weather systems were inspected. The Director, Systems Operations Control was interviewed concerning dispatcher scheduling, severe weather operations and flight cancellations.

**FINDINGS:**

None.

**OPERATIONS RECORDS****1.09****DESCRIPTION:**

AirTran Airlines maintains operations records in accordance with the provision of 14 CFR Part 121. These records are maintained at the Atlanta office facility located at 1800 Phoenix Blvd., Suite 126, Atlanta, GA. AirTran Airline utilizes hard copy records for pilot record keeping purposes. At the present, there is a total of 21 AirTran Airlines check airmen and eight (8) flight safety check airmen. The company at the present has approximately 200 pilots.

**INSPECTION DATA:**

A 50% sample of AirTran Airlines records was inspected for compliance with applicable 14 CFR Part 121 regulations. AirTran Airlines personnel explained and clarified the record keeping policies and procedures.

**FINDINGS:**

**1.09.01:** 14 CFR Part 121.683(a)(1) requires a certificate holder to maintain current records of each crewmember in order to show compliance with the applicable sections of 14 CFR Part 121.

While the operator does maintain records of each crewmember, the procedures used by the operator to record and document the required ground training for flight attendants is not detailed enough to ensure compliance with 14 CFR Part 121.683(a)(1).

**CORRECTIVE ACTION:** This issue is being investigated under Enforcement Investigation Report number 98SO110060.

Finding closed.

**1.09.02:** A review of the Customer Service and Ramp Employee Training Records revealed that the individual folders of several employees did not contain any documentation for their initial training sessions. Therefore, the company was not in compliance with their procedures contained in Standard Practice 6100.4.

**CORRECTIVE ACTION:** Operator was notified of this discrepancy by letter of December 11, 1997. Their responses of January 5 & 9, 1997, indicate that upon recall to duty prior to the operator's resumption of service in conjunction with the July 1996, Consent Order, customer service employees were retrained by attending the *airline's* entire initial hazardous material training. Passing a written exam marked the completion of the course and the actual exam provides the written record of course completion in the employees training record.

However, seven customer service employees were given an exam marked “recurrent” instead of “initial.” The recurrent exam actually was more comprehensive than the initial, containing five additional questions (25 vice 20).

Investigation confirmed these assertions. These “recurrent” exams have been evaluated by FAA inspection as an adequate indicator of course material retention. Additionally, the operator recovered the employee’s initial training exams from their home stations and placed them in the training records. Finally, a memo of explanation from the Director of Customer Service has been placed in each of the seven records. Surveillance has verified these corrections.

The operator’s policies are in compliance with the FAR’s. The operator instituted appropriate corrections.

Finding closed.

**1.09.03:** A review of completed weight and balance forms for AirTran flights revealed that several of the completed forms had been calculated incorrectly.

14 CFR Part 121.665 states “Each certificate holder is responsible for the preparation and accuracy of a load manifest form before each take-off.”

Therefore, the company is not in compliance with 14 CFR Part 121.693(b)(4) & (c)(d) in that the load manifest for these flights did not have an accurate total weight computed under approved procedures nor did it have accurate evidence that the aircraft was loaded according to an approved schedule that insures that the center of gravity was within approved limits.

**CORRECTIVE ACTION:** Errors on two weight and balance forms were noted by the NASIP team. The finding was investigated by the Atlanta FSDO. It was determined that the noted errors did not result in any aircraft operating in an over weight or out of balance condition and did not affect safety of flight. Although trained in the preparation of manual weight & balance forms, AirTran Airlines pilots were utilizing an Automated Weight & Balance Program for their 115 passenger aircraft. Because an Automated Weight & Balance Program had not been approved for the 106 passenger aircraft, the airline should have provided their pilots a refresher training course in the preparation of manual weight and balance forms prior to placing the reconfigured aircraft into service on October, 1997. Upon discovery of this finding, at the FAA’s request, the company initiated a refresher training course that all pilots attended prior to flying the 106 passenger configured aircraft. As a result of this investigation, EIR 98SO110066 was initiated and completed with a Letter of Correction to the airline.

Finding closed.

**FACILITIES AND EQUIPMENT****1.10****DESCRIPTION:**

AirTran Airlines, Inc., conducts scheduled 14 CFR Part 121 operations from its main base at Atlanta Hartsfield International Airport. Ground transportation service from Chattanooga, TN and Macon, GA is provided by a Flight Link service operated by Greyhound Bus Lines.

All stations, except Philadelphia, PA, have a station manager and ground personnel, who are all company employees. AirTran's flights into Philadelphia are handled by Trans World Airways. All station managers report to a Regional Director, one for the North Sector and one for the South Sector.

Station procedures are contained in "Company Manuals", which include guidance to personnel in all areas of station operations.

Training records for employees are maintained at company headquarters in Atlanta, GA.

**INSPECTION DATA:**

Station facilities and manuals at various line stations were reviewed during enroute inspections..

**FINDINGS:**

**1.10.1:** AirTran line station personnel were observed operating ground equipment at speeds higher than the speeds contained in their Standard Practice 6735. Therefore, the company is not in compliance with their procedures.

**CORRECTIVE ACTION:** Operator was notified of NASIP finding and speed discrepancies by letter of December 11, 1997. Investigation revealed that, during calendar year 1997, over 30 ground service vehicle incidents were recorded with ValuJet/AirTran Airlines vehicles. Surveillance confirms some instances of ramp vehicle operation at higher than specified speeds.

The carrier has written policies and safety procedures in their manuals. The Safety Department has been alerted by this finding and has instituted a program of re-education. Written and verbal notices have been issued to all stations' ramp personnel. Additionally, Atlanta Station managers are conducting a comprehensive program of re-emphasis on ramp vehicle speed control. Satisfactory policies are in place. Operator's management is aware and have taken steps to enhance vehicle operation safety.

Finding closed.

# **AIRWORTHINESS**

## **MANAGEMENT**

### **2.01**

#### **DESCRIPTION:**

AirTran Airlines Incorporated is a certificated Part 121 air carrier maintaining aircraft under the provisions of this Part. The maintenance effort is directed and managed by a President and Chief Executive officer, a Senior Vice President of Maintenance and Engineering, a Vice President of Maintenance, a Vice President of Quality Assurance, Chief Inspector, and a Director of Engineering.

The Vice President of Maintenance is assisted by Directors of Powerplant and Landing Gear, Maintenance and Contract Maintenance Administration, and Managers of Maintenance Control and Maintenance Training.

The Vice President of Quality Assurance and Chief Inspector is assisted by Managers of Inspection, Aircraft Records, Quality Assurance and Reliability/Continuous Analysis and Surveillance Program. He also employs a Director of FAA Liaison

#### **INSPECTION DATA:**

The company organizational chart was used as a basis for evaluation. The resumes of the Chief Executive Officer, Senior Vice President of Maintenance and Engineering, and FAA Liaison Officer were reviewed. Interviews were held with the remaining personnel along with daily discussions between team members and company management personnel during the conduct of the inspection.

AirTran Airlines inspection override procedures were reviewed, per AirTran Airlines Standard Practice 8105 and 8001.

#### **FINDINGS:**

**2.01.01:** The Vice President of Quality Assurance and Inspection reports to the Senior Vice President of Maintenance and Engineering. The Senior Vice President of Maintenance and Engineering for AirTran is the determining factor whenever a disagreement exists between QA and production. The Senior Vice President of Maintenance and Engineering does not have an A&P certificate. There is no separation of maintenance and quality as required by CFR 214 Part 121.378.

**CORRECTIVE ACTION:** Atlanta FSDO personnel reviewed the applicable Federal Aviation Regulations and the AirTran Airlines' Standard Practice 8001 outlining the duties, responsibilities and authorities of management personnel. The Senior Vice President of Maintenance and Engineering position was established at the administrative corporate level to oversee the areas of maintenance engineering, planning, and maintenance activities. This position was not assigned responsibilities nor decision making authority directly affecting airworthiness determinations and therefore the individual is not required to possess an airframe and powerplant certificate.

The Maintenance Department's organizational structure originates with the aircraft mechanics (certificated mechanics), reporting to a maintenance supervisor (a certificated mechanic), through a maintenance station manager (certificated mechanic), to the Director of Maintenance (a certificated mechanic), who, then, reports to the Vice President of Maintenance. Additionally, the Quality organizational structure originates with a Quality Assurance inspector (a certificated mechanic), reporting to a Chief Inspector (certificated mechanic), to the Vice President of Quality Assurance & Inspection. (also a certificated mechanic). These two separate job functions and organizational structures, maintenance and quality assurance/inspection, are separated and independently administered below the Senior Vice President of Maintenance and Engineering. Thus, the current structure is in compliance with the Federal Aviation Regulations.

Finding closed.

**CERTIFICATE & OPERATIONS SPECIFICATIONS****2.02****DESCRIPTION:**

AirTran Airlines is the holder of Air Carrier Certificate VJ6A465W.

The certificate holder is authorized to conduct domestic and supplemental airplane operations in common carriage pursuant to 14 CFR Parts 119 and 121.

The original Operation Specifications, part A, B, C, D and E are kept in the Tech. Pubs. Office, located at 1800 Phoenix Blvd., Suite 126, Atlanta, GA 30349.

The Operations Specifications (OPS SPEC) contain six (6) exemptions in paragraph A5. These exemptions were 3585J or as amended, 5408D or as amended, 3474 G or as amended, 5487B or as amended, 5317F or as amended, and 6395 or as amended.

**INSPECTION DATA:**

Sections D and E of the Operations Specifications were reviewed utilizing criteria and standards set forth in 14 CFR Part 119.7(b).

**FINDINGS:**

**2.02.01:** AirTran Airlines contracts with a company not listed on Operations Specifications, D-91-2 for modification by STC#STO1473AT. (Leading Edge Aircraft Painting of Greenville, MS) This is contrary to CFR 14 Part 119.49(a)(13).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.02.01 and reviewed all applicable documentation. This review verified that AirTran Airlines contracted with Leading Edge Aircraft Painting, an FAA certificated repair station, to paint twelve aircraft. However, aircraft painting does not meet the definition of a “major repair or alteration” and is not considered “substantial maintenance” as defined by the criteria listed in the FAA Order 8300.10 Handbook Bulletin 96-05(B).

Nevertheless, AirTran Airlines additionally contracted with Leading Edge and initiated the installation of business class seating while the aircraft were in for painting during September through December 1997. AirTran Airlines is required by the Operations Specifications to notify the FAA prior to the performance of any maintenance classified as substantial maintenance. Additionally, “major alteration” is one of the criteria which must be listed on the operator’s operations specifications, paragraph D-91 prior to actually performing the maintenance. The seating change does constitute a major alteration and, as such, requires a revision to paragraph D-91 of the operations specifications.

AirTran Airlines did not inform the Atlanta FSDO of this seating modification being conducted at Leading Edge for the four months of the original painting contract concluding in December 1997. During that period, it appears that AirTran failed to notify the FAA of the major alteration and, since Leading Edge is no longer (as of December 1997) an AirTran Airlines contractor, it was not added to AirTran Airlines' Operations Specifications paragraph D91.

The Atlanta FSDO has initiated Enforcement Investigative Report (EIR) No 98SO110061 to investigate the failure to add the substantial maintenance organization to the operations specifications prior to the performance of maintenance.

Finding closed.

**2.02.02:** Contractual maintenance as listed in D-91 is not authorized in section A-4 of the AirTran Operations Specifications.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.02.02. In review, it was discovered that paragraph A-4 (Summary of Special Authorizations and Limitations) of the AirTran Airlines Operations Specifications did not list D-91 (Authorization to make arrangements with other organizations to perform Substantial Maintenance). This was an FAA administrative oversight due to a computer default feature in the Flight Standards Automation System (FSAS) auto fill programming. This default does not automatically update paragraph D-91, nor alert the operator of the necessity for manual input.

Paragraph A-4 to the Operations Specifications was corrected and properly issued by amendment six dated November 13, 1997.

Finding closed.

**MANUALS AND PROCEDURES****2.03****DESCRIPTION:**

AirTran Airlines uses an accepted Standard Practice System to write, publish, and control company manuals. The intent of the system is to provide uniform guidance and procedures to all functional areas operating collectively to facilitate accomplishment of company objectives which are in compliance with established rules, regulations, and policies. This Standard Practices System is controlled by a numbering system which assigns a sequence of numbers to each department. All manuals produced by AirTran Airlines, as required by 14 CFR Part 121, are serial numbered in accordance with the Standard Practice System format.

**INSPECTION DATA:**

Reviewed AirTran Airlines Standard Practices Manuals pertaining to maintenance and servicing personnel for correct policy, procedures, and revision status.

**FINDINGS:**

**2.03.01:** AirTran's SPM pertaining to maintenance and servicing contain incorrect FAR references as required by FAR 119.65.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.03.01 and reviewed all the applicable documentation. AirTran Airlines Standard Practice 102, introduction 102.1, stated that the standard practice depicted those positions required by FAR 121.59. This FAR no longer exists and has been replaced with FAR 119.65.

AirTran Airlines has changed Standard Practice 102 to reference the correct Federal Aviation Regulation FAR 119.65. The Standard Practice was reviewed and accepted by this office on January 21, 1998. This administrative oversight had no impact on safety.

Finding closed.

**2.03.02:** The Standard Practice Manual, Section 201, lists Severe Weather Procedures in the table of contents. Paragraph 3, "Emergency Notification", is missing or not entered.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.02 and reviewed all the appropriate documentation. AirTran Airlines had placed emergency procedures in SP 200 and failed to remove title from index of SP 201. AirTran Airlines revised Standard Practice 201 which was accepted by Atlanta FSDO on January 1, 1998.

Finding closed.

**2.03.03:** AirTran Airlines is not following the GMM by using unidentified maintenance forms to record NDT inspections. This is contrary to CFR 14 Part 121.363(a)(2) and 119.5(g).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.03 and reviewed all the appropriate documentation. The Items of Proof in this finding consist of blank training forms that were found during the NASIP Inspection. The forms were old forms that were used to document non destructive testing (NDT) on the job training. The forms are no longer used. The Chief Inspector had revised the method of documenting on the job training, but the NDT manual had not been updated. The Atlanta FSDO investigation disclosed that these forms were not used to record NDT inspections as stated by the finding. Engineering Orders and Work Orders are used to record NDT maintenance tasks. AirTran Airlines has revised the Non Destructive Testing (NDT) manual specifying how on the job training will be documented. The FSDO accepted this revision on January 22, 1998

Finding closed.

**2.03.04:** The AirTran SPM does not contain instructions to comply with each maintenance action as listed in their Operations Specifications as required by CFR 14 Part 119.43(b).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.04 and reviewed all relevant documentation. CFR 14 Part 119.43(b) requires that pertinent excerpts of the operations specifications be inserted into the certificate holder's (airlines') maintenance manuals. AirTran Airlines had inserted all appropriate excerpts throughout their manuals (Standard Practices) and were in compliance with the Federal Aviation Regulations (FAR). AirTran Airlines issued a new Standard Practice 8004, dated January 20, 1998, to enhance and simplify the listing. The Atlanta FSDO accepted Standard Practice 8004 on February 6, 1998.

Finding closed.

**2.03.05:** AirTran SPM 8008.2 references the wrong FAR when addressing the Maintenance Program Interval for Inspection Checks. This is contrary to CFR 14, Part 121.363(a)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.05 and examined all the pertinent documentation. In review, it was noted that FAR 119 went into effect on March 20, 1997. AirTran Airlines' Standard Practice (SP) 8008 was not revised to reflect Federal Aviation Regulation (FAR) 119 as an applicable reference. This administrative error had no effect nor impact on air safety. AirTran Airlines' Revision 95 to the General Maintenance Manual, dated February 1, 1998 corrected this discrepancy in SP 8008.2.

Finding closed.

**2.03.06:** AirTran Airlines aircraft N949VV, log page no. 50286-37, item 1, disclosed the number 1 and number 2 VHF NAV receivers were swapped and the part numbers "OFF" and part numbers "ON" blocks were not filled out. AirTran does not have a procedure in their SPM that allows for parts swapping. This is contrary to AirTran's SPM and CFR 121.363(a)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.06 and reviewed all appropriate documentation including AirTran's Standard Practice 8132 and found that they do have a procedure for swapping parts. The Atlanta FSDO's investigation determined that the on and off blocks were not completed. This action did not comply with AirTran Airlines procedures, but did not constitute a violation of Federal Aviation Regulations (FAR's). AirTran Airlines' management personnel counseled the mechanic on December 2, 1997. Shift managers cautioned all Atlanta facility mechanics on this finding the same day.

Finding closed.

**2.03.07:** AirTran uses three abbreviations (DI, DM and DS) in the Reliability Program for analysis and problem identification. These abbreviations are not identified in the GMM or SPM. This is contrary to CFR 14 Part 121.135(a)(1).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.03.07 and reviewed all the associated documentation. Of note in the finding is the discovery of an apparent discrepancy in a "Reliability Program." AirTran Airlines is not required to maintain a reliability program. The airline did not have such a program at the time of the NASIP inspection nor does the airline currently have one.

However, since these abbreviations appear in other manuals, AirTran Airlines has subsequently added the abbreviations DI, DM, and DS to Standard Practice (SP) 8720 (Definition of Significant Terms) in Revision 12 to the Continuous Analysis and Surveillance Program (CASP) Manual. Also, these abbreviations were included in SP 8015 (Definitions of Maintenance Terms and Abbreviations) as a part of Revision 95 to the General Maintenance Manual (GMM). The Atlanta FSDO has reviewed and accepted these changes.

Finding closed.

**2.03.08:** AirTran Airlines Engineering Department Technical Manuals are not being tracked as required by the GMM, Section 8035, Page 1, Para 3(a). This is contrary to CFR 14 Part 121.363(A)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.03.08 and reviewed all the appropriate documentation. The FSDO review indicated the manuals in the engineering department were current, however, the technical publications personnel were not documenting the monthly check. It was determined that this administrative oversight had no impact on air safety.

AirTran Airlines submitted a revision to Standard Practice 8035 to clarify current tracking procedures and assign a form number to the document used to record the monthly check. This action reinforces the established procedures that the technical publications personnel are to follow. Revision 95 to the General Maintenance Manual (GMM) was accepted by the Atlanta FSDO on February 6, 1998.

Finding closed.

## **TRAINING PROGRAMS**

### **2.04**

#### **DESCRIPTION:**

AirTran Airlines describes Maintenance/Inspection Training in standard practice 8130 of the General Maintenance Manual. It describes a progressive training syllabus, identifies responsibility and lists required documentation to comply with the requirements of 14 CFR Part 121.375.

#### **INSPECTION DATA:**

The policies and procedures were reviewed along with on site interviews of AirTran Airlines maintenance and inspection personnel. The Maintenance and Inspection Personnel Training Program was evaluated to ensure that the training received throughout the operator's system is of equal quality and effectiveness. This evaluation also includes contract personnel performing scheduled maintenance and inspection work. Sixty percent of the maintenance training folders were reviewed for compliance.

#### **FINDINGS:**

**2.04.01:** AirTran Maintenance training records disclosed that SPM 8130, page 2/3, Para C and 7 are not being followed. Form VJ M029, "Personnel Training Acceptance Record", was not issued to three (3) folders including the Manager of Training. This is contrary to the SPM and CFR 14 Part 121.363(a)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.04.01 and reviewed all applicable documentation. It was determined, by reviewing the training records, that the employees in question were qualified. However, the specific form VJ-M029 (Personnel Training Acceptance Record) was not consistently completed and placed in the individuals' training record.

Form VJ-M029 is used to accept previous training from other employers and is signed by the Manager of Maintenance Training as per SP 8130.2(f). This was an administrative oversight on AirTran Airlines' part. This action is contrary to the AirTran Airlines maintenance manuals, but not a violation of Federal Aviation Regulations (FAR's) 121.363. A letter from the Atlanta FSDO was sent to AirTran Airlines on January 20, 1998 requesting immediate corrective action of this item. Additionally, the letter requested an audit of all records in the airlines' Training Department.

Subsequently, corrective action has been completed on the three files in question and an audit on all maintenance training records was completed on January 26, 1998. AirTran Airlines reported that all records are in compliance in a letter dated January 29, 1998.  
Finding closed.

**2.04.02:** Review of AirTran Airlines General Maintenance Manual, Standard Practice 8130, revealed that the criteria to determine acceptability of contract training to include qualifications of instructors, criteria to establish appropriateness of reference material being taught, reporting procedures to inform operators of student progress, criteria to determine adequacy of facilities, and criteria to evaluate contractors training syllabus was omitted. This could lead to non-compliance with 14 CFR Part 121.375.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.04.02 and reviewed all the appropriate documentation and manuals. The curriculum used as the course syllabi and qualifications of contract trainers are taken from company manuals accepted by the FAA through the Atlanta FSDO.

There is not a regulatory requirement to determine acceptability of contract training, to include the professional qualifications of instructors. However, AirTran Airlines has agreed to place a requirement in Standard Practice 8130 for instructors to hold an FAA Airframe and Powerplants certificate with a minimum of two years experience.

Additionally, there is no requirement for a procedure to inform operators of students progress in the training curriculum. The only notification will be pass or fail.

There is no requirement for criteria to determine adequacy of facilities. The curriculum employed as the course syllabus is derived from the company manuals which are accepted by the Atlanta FSDO. Also, instructors for AirTran Airlines may not teach any subject unless they have personally completed the same training him/herself.

In review, AirTran Airlines training program is adequate. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding Closed.

**2.04.03:** A review of individual training records revealed that individual(s) were given full credit for course attendance and the classroom training record, form VJ M030, was not initialed for each day by the student(s). This is contrary to 14 CFR Part 43.12 and the AirTran Airlines GMM 8130. 6(e).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.04.03 and reviewed the applicable documentation. Training was actually completed and an entry in the computer file was inadvertently made for two individuals to record full credit of classes attended without the verifying initials on Form VJM030. The computer records and the discrepant forms have been corrected by the airline and verified by Atlanta FSDO.

AirTran Airlines has conducted additional training for instructors and training records personnel on January 26, 1998. The airline has also conducted a review of all training records for completeness and accuracy. The Atlanta FSDO's subsequent investigation and review of AirTran Airlines training records in question determined that all training records were in compliance. It was determined that this discrepancy is administrative only in nature and has no impact on safety. Finding closed.

**2.04.04:** A review of AirTran Airlines General Maintenance Manual, Standard Practice 8130, revealed that the criteria for determining the quality of the training program (training standards) was omitted, there are no individual files identifying instructors histories, qualifications and assignments and the GMM does not address the process by which instructors are determined to be qualified. This could lead to non-compliance with 14 CFR Parts 121.371(a) and 121.375.

**CORRECTIVE ACTION:** On January 22, 1997, the Atlanta FSDO investigated this finding by reviewing SP8130, as well as all aircraft maintenance instructor training files.

After thorough review, it was determined that there is no requirement for criteria to be developed or published for determining the quality of aircraft mechanics training program in either the Federal Aviation Regulations (FAR) Part 121 or in AirTran Airlines' General Maintenance Manual (GMM) / Standard Practice (SP) system. AirTran Airlines does have an aircraft mechanic training program which consists of a DC-9 Familiarization Course Syllabus and SP 8130 which provides policies and procedures for the administration of the training program. This training program, outlined in SP8130, has been accepted by the Atlanta FSDO.

Also, there is no regulatory requirement in AirTran Airlines' General Maintenance Manual system or the FARs for a Part 121 air carrier to maintain files of individual aircraft maintenance instructor histories, qualifications, and assignments. AirTran Airlines does maintain individual company originated training files for its aircraft maintenance instructors.

Designated instructors are appointed by the Manager of AirTran Airlines Training Department and accepted by the airline as per the procedures delineated in Standard Practice 8130. AirTran Airlines further improved their safety position by amending Standard Practice 8130 in Revision #95, to the General Maintenance Manual. In this revision, the airline added that the maintenance instructors will be FAA Airframe & Powerplant certificated. Revision # 95 was accepted by the Atlanta FSDO on February 6, 1998.

The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.04.05:** A review of the Zantop Repair Station Training Folder, at the Atlanta Training Department, revealed that 22 designated instructor training records, Form VJ M018, were in the folder and were not in the individuals training records. This is contrary to AirTran Airlines General Maintenance Manual, Standard Practice 8130.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.04.05 and reviewed all applicable documents. There is no requirement to have contractors training records in individual folders in Atlanta. AirTran Airlines keeps copies of contract training records in a general folder in Atlanta. Training records for Zantop training are kept at the Zantop facility. The Atlanta FSDO had verified that the appropriate records are at Zantop in accordance with AirTran Airlines' procedures. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.04.06:** A review of AirTran Airlines employees training records revealed that the classroom training records, form VJ M030, are not being properly filled out. This is contrary to AirTran Airlines GMM Standard Practice 8130.6(e) and CFR 14 Part 121.363(a)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO reviewed AirTran Airlines General Maintenance Manual and training records. The records in question were not initialed by the students. AirTran Airlines procedures require the form to be initialed for training of more than one day. The training documented was for one day or less and did not require an initial.

Finding closed.

**2.04.07:** A review of AirTran Airlines GMM, revealed that Standard Practice, 8130, did not have maintenance training category computer codes listed or referenced. Interviews with the training staff indicated that the computer system codes are being maintained by the training technicians with handwritten additions to an outdated list. This could lead to non-compliance with 14 CFR Part 121.375.

**CORRECTIVE ACTION:** The Atlanta FSDO has investigated finding 2.04.07 and determined that AirTran Airlines was using an outdated list of codes. AirTran Airlines will evaluate its Computerized Management System procedures and produce an operating manual for the CMS System that will include computer codes by March 21, 1998.

Closure is pending follow-up in accordance with the Atlanta FSDO's action plan.

**2.04.08:** Review of training records for contract agencies, revealed that the training conducted by designated instructors for contract agencies is not being forwarded to AirTran Airlines Maintenance Training. This is contrary to the AirTran Airlines GMM and CFR 14 Part 121.363(A)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.04.08 and reviewed the relevant documentation and training records. There were no Items of Proof provided by the NASIP team for this finding. The Atlanta FSDO reviewed a total of 60 records and found no deficiencies. It should be noted that there is a time delay in their system for the training records to be forwarded from the outer stations.

In a letter to its contractors, AirTran Airlines has reiterated to the training departments to forward all records of new or updated training to Atlanta Maintenance Training Department in an expeditious manner. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.04.09:** Personnel employed by Leading Edge Aircraft Painting (CRS L4ER) and recognized by AirTran Airlines as maintenance providers received company initial training. The DC9 familiarization course training was not accepted until 10/14/97 as indicated by the VJ-M029 on file at AirTran Airlines. No such record was found at Leading Edge Painting. Eight AirTran aircraft were processed through the repair facility before this date. Records for three of these aircraft N936VV, N910VJ and N931VV were reviewed which had maintenance and required inspections (RII) performed by persons who did not meet the training requirements set forth in AirTran Standard Practices 8130.2, 8130.4 or 8130.13(E)(3)(c) prior to 10/14/97. This is contrary to 14 CFR Part 121.371(a).

**CORRECTIVE ACTION :** Personnel from the Atlanta FSDO investigated finding 2.04.09 and reviewed AirTran Airlines procedures and training records. Two Leading Edge Inspectors previously received DC-9 familiarization training from Continental Airlines on August 30,1996. This DC-9 training was accepted by AirTran Airlines and the two Leading Edge inspectors were authorized as RII inspectors on September 18,1997. Form VJ-MO24 and RII card VJ-M006 were filled out at this time by the chief inspector. All paperwork was forwarded to the Atlanta Training Department for review and acceptance of the previous training (per Standard Practice 8130) by the Manager of Maintenance Training. Form VJ-M029 (Personnel Training Acceptance Record) was signed on October 14,1997. There is no requirement for the VJ-MO29 form to reside at contract maintenance facilities.

At no time were any of the three aircraft signed off by individuals who were not qualified or did not meet the training requirements. AirTran has changed SP8130.2(f) to read, “form VJ-M029 can be signed by the Manager of Maintenance Training or the Chief Inspector in the case of RII” for acceptance of previous training. This will stop any lag time between acceptance of previous training and RII approval.

Finding Closed.

## **RECORDS SYSTEM**

### **2.05**

#### **DESCRIPTION:**

AirTran Airlines GMM Standard Practice 8240, requires record retention of hard copy records of all work performed. AirTran Airlines GMM Standard Practice 8145, requires maintenance control to verify and/or retain verification of assigned completed task as deferred task until originals are received by aircraft records. AirTran Airlines GMM Standard Practice/Airworthiness release/log entry 8141.3B(a), states that the signatures of authorized certificated mechanic (A&P) on the Airworthiness release or signature of certificated mechanic or repairman on log entry constitute the work was performed in accordance with the requirement of the certificate holders manual. AirTran Airlines GMM Standard Practice 8100, requires RII items inspected prior to signing of the Airworthiness release.

#### **INSPECTION DATA:**

AirTran Airlines, General Maintenance Manual , Incorporating Rev., #91, dated 10/15/97, the record keeping requirements of the Federal Aviation Regulations and the guidance contained in FAA Order 8300.10 .

#### **FINDINGS:**

**2.05.01:** AirTran Airlines maintenance and inspection personnel falsified maintenance records required by 14 CFR Part 121.380(a)(1) in direct violation of 14 CFR Part 43.12(a)(1) by statements on AirTran Airlines non-routine work sheet form AirTran Airlines-M052A. Numerous items requiring an operational and/or leak check were performed on engine P&W JT8D-9, serial number 674615, from 9/26/96 through 2/13/97. This occurred prior to the installation of engine, serial number 674615, on the number two (2) position of aircraft N914VV, on 4/12/97, by Zantop International Airlines, Inc., CRS #ZIAD650A.

It is noteworthy that these maintenance records were discovered by a member of the NASIP team during a facility inspection of an aircraft parts warehouse office, previously occupied by AirTran Airlines maintenance personnel for engine maintenance. This facility is located at 3540 Brownsmill Road, Hapeville, GA. The original documents were hand carried to the record keeping department at AirTran Airlines headquarters. These findings were immediately brought to the attention of the manager of engine and component maintenance on 10/30/97.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.05.01 and reviewed maintenance records to include AirTran Airlines' non-routine work sheet (Form M052A). The investigation determined that AirTran Airlines has a Non-Routine Work Card system and that they do follow the system. The Quick Engine Change (QEC) build-up is covered by Routine Work Cards and not Non-Routine Work Cards.

The Non-Routine Work Sheets were initiated by an AirTran Airlines employee in error and not in accordance with AirTran Airlines procedures. AirTran Airlines would not have known these cards existed and, thus, would not have been able to audit them. Further investigation has determined that the engine was installed at Zantop International (an FAR part 145 Repair Station), and that the Non-Routine Cards were not required and did not support the airworthiness determination of the engine. All items and checks covered on the Non-Routine Cards are included in the "Engine Change Routine Cards." The Atlanta FSDO has confirmed that all items on the Routine Cards were completed when the engine was installed. Therefore, no violation of regulatory compliance existed with this issue.

In an interview with Atlanta FSDO inspectors, the employee who generated the Non-Routine Work Cards was not clear in his memory of the specific event in question. Nevertheless, he stated that, to the best of his recollection, at the end of his work day, he had completed the corrective action section of the Non-Routine Cards as a record of his work.

In order to prevent a reoccurrence of a mechanic initiating additional non-routine task cards, AirTran Airlines is revising its routine QEC Build Task Cards with a special emphasis on "individual sign-offs" for external components of the JT8D engine. Procedures for specifically handling powerplant removal and replacement documents as well as the issuance of an airworthiness release after the performance of a powerplant installation meet the requirements of the regulations. These revised procedures and task cards have been forwarded to the Atlanta FSDO for review and acceptance. The follow up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.05.02:** AirTran Airlines, operated aircraft N914VV for a total of 860 flights and 940.2 hours in revenue service, contrary to the requirements of 14 CFR Part 121.709(b)(1)(2) when it failed to ensure that the proper maintenance documentation was available prior to the initiation of an Airworthiness release on 04/17/97. Additionally AirTran flight log sheets immediately following the sign off, indicated 3 unsuccessful test flights for aircraft and engine discrepancies.

It was additionally found, that AirTran Airlines failed to follow the procedures set forth in its GMM, by not insuring that all items require to be inspected are inspected by an authorized person that could determined the work was performed satisfactorily. This is contrary to CFR 14 Part 121.363(a)(2).

**CORRECTIVE ACTION:** The Atlanta FSDO's investigation determined that all items required by AirTran Airlines' procedures to meet FAR 121.709 (b) (1) (2) were complied with prior to the aircraft's operation or return to service. An investigation into this finding (2.05.02) has revealed that AirTran Airlines performed a total of five (5) local acceptance flights according to applicable aircraft log sheets and their computer system tracking documentation. Four (4) of these local acceptance flights were unsatisfactory.

(It is important to note that this aircraft had been removed from long term storage and was in the process of being returned to service.)

During these local acceptance flights, numerous discrepancies were being evaluated for corrective action and operational verification. All local acceptance flights were operated in accordance with AirTran Airlines Standard Practice 8160. No Violation of FAR 121.363 (a)(2) or any other FAR was discovered during the investigation of this finding. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**MAINTENANCE FACILITIES****2.06****DESCRIPTION:**

AirTran Airlines performs aircraft maintenance at terminal “C”, Hartsfield International Airport, Atlanta GA, Dulles International Airport, Chantilly, VA and Fort Lauderdale International Airport, Fort Lauderdale FL. The company also operates an engine maintenance facility located at 1864 Sullivan Road, Suite A-1, Atlanta, GA, and a parts warehouse at 3540 Brownsmill Road, Hapeville, GA. AirTran Airlines has no hangar facilities which will accommodate the DC-9 aircraft.

**INSPECTION DATA:**

Maintenance base inspections were made at the facilities listed above using the Federal Aviation Regulations criteria and FAA guidance during the course of the NASIP. Surveillance was performed at Leading Edge Aircraft Painting Inc. Repair Station #L4ER923, an AirTran contract maintenance facility located in Greenville Mississippi. Agreements between AirTran Airlines and Leading Edge were provided by the General Manager of Leading Edge. Interviews were also conducted with the Project Manager representing AirTran Airlines and the General Manager of Leading Edge. An Inspector monitored work being performed on two aircraft, N902VV and N901VV, in various stages of directed repair by AirTran Airlines. A review of repair station maintenance records for six aircraft, N902VJ, N910VJ, N921VV, N931VV, N936VV and N946VV that had been worked on by the repair station was conducted. The team evaluated the performance of work being accomplished on aircraft owned by AirTran Airlines at Leading Edge for compliance with the AirTran Airlines maintenance program. It was determined the exterior painting and flight control balance was to be accomplished by repair station #L4ER923. All other work performed was to be considered “over and above” the maintenance agreement with Leading Edge. In that instance, Leading Edge provided manpower only and performed work under the supervision of AirTran Airlines.

**FINDINGS:**

**2.06.01:** A maintenance control audit sheet to identify the calibration status of special tools and equipment produced by the CMS computer system, dated 10/28/97 indicated 58 items with expired calibration dates. Examples listed:

1. Torque Wrench #VJ303C found on a box was out of calibration. It was not tagged as unserviceable as required by SPM 8120. Further investigation disclosed that AirTran had reported the tool as being lost.
2. Wire Strippers found in the Atlanta facility were not calibrated as required by the manufacturer’s manual.

3. An ATC-600A Test Set was found in the Atlanta facility tool room on 11/3/97, had a calibration expiration of 10/09/97. This is contrary to AirTran Standard Practice, section 8120.2 and CFR 14 Part 121.369(b)(5).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.06.01 and reviewed all relevant documentation including AirTran Airlines procedures and calibration records. At the time of the NASIP inspection, all 58 items of calibration listed as overdue were in stores tagged awaiting calibration or had been shipped to a vendor for calibration.

Additionally, a torque wrench was listed as “missing.” When the wrench was found it was beyond economical repair and was scrapped on November 6, 1997. The wire strippers are not required to be calibrated unless the jaws are replaced. The Atlanta FSDO found no record of the jaws being replaced.

Finally, in reference to an instrument requiring calibration, AirTran Airlines’ procedures permit the use of the instrument until the end of its calibration expiration month. The ATC-600A test set observed by the NASIP inspector had an October 9 due date allowing its use until the end of October. Atlanta FSDO inspectors verified that the test set in question was not used after October 31, 1997 and was waiting to be sent out for calibration at the time of the inspection. It was calibrated by Barfield Inc. Atlanta, Georgia on December 14, 1997 by work order # 9700352. The follow up investigation did not disclose sufficient evidence to substantiate the finding.

Finding closed.

**2.06.02:** During surveillance of AirTran Airlines Engine Shop, on October 24, 1997, the following discrepancy was found: A Constant Speed Drive (CSD) adapter pad was removed from an aircraft engine and an Equipment Transfer Record (ETR) Form Number 19810 attached established Airworthiness for the item. AirTran Airlines inspector Number I-4, stamped the ETR Form. Only section A of the AirTran Airlines ETR form was completed. AirTran Airlines GMM, Section 8212, Paragraph B(5)(a), indicates that a part removed from an assembly must have part A and B of the AirTran Airlines ETR Form completed. AirTran Airline did not follow their GMM procedure. They by failed to properly complete section B of AirTran Airlines’ ETR Form as described in their GMM. One item is identified here however, numerous components were found in this condition.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.06.02 and reviewed all the applicable documentation. Per AirTran Airlines Standard Practice 8110.3 (Procedures), all incoming parts are inspected at the time of receipt at the Atlanta Store Facility for serviceability and proper documentation. The omission in filling Part B of the Equipment Transfer Record indicated in this finding was an administrative oversight which did not result in a compromise of flight safety.

To address the potential of repeating this discrepancy, AirTran Airlines revised Standard Practice 8212.2 Paragraph B(5)(a). Revision 95 to the GMM, which clarifies the procedures on filling both Part A and B of Form AT-MO21 (Equipment Transfer Record), was accepted by the Atlanta FSDO February 6, 1998.

Finding closed

**2.06.03:** Multiple discrepancies disclose systemic problems in the stores department. Examples: (Ft Lauderdale facility): three (3) cans of Edge Sealer 1450S were found in stored with three (3) Ni-cad aircraft batteries. The Material Data Sheets for these items prohibit confined storage in close proximity. This is contrary to the AirTran Airlines GMM and CFR 14 Part 121.363(a)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.06.03 and reviewed all the appropriate documentation. There were three cans of sealer sitting on a shelf approximately 10 feet from three Ni-cad batteries that were in shipping containers. All three cans of sealer were sealed shut. AirTran Airlines has counseled Fort Lauderdale maintenance personnel and have put a metal cabinet in the facility for storage of flammable material. The Atlanta FSDO found this action was contrary to AirTran Airlines procedures, but not a violation of 14 CFR 121.363(a)(2).

Finding closed.

**2.06.04:** In the Atlanta facility, a visibly damaged tire servicing gauge (0-300-PSI) was found for use in the tool room. When requested, the operator tested the gauge to 200 PSI. The actual gauge reading was 140 PSI at this test point. The use of faulty equipment could lead to non-compliance with 14 CFR Parts 43.13(c) and 121.363(a)(2).

**CORRECTIVE ACTION:** The finding states that the NASIP Inspector found a tire pressure gauge in the tool room that was visibly damaged and gave an erroneous reading. Accuracy was checked against a test set in the tool room, that is used to check all tire pressure gauges before the gauges are issued to a mechanic, for use on the aircraft. The gauge in question had been checked for calibration by Barfield, Inc. on 9/12/97 and was due to have the calibration checked again on 9/12/98, according to the Item of Proof supplied by the NASIP inspector. The damage consisted of a small chip in the plastic bezel that secures the glass face. This type gauge is liquid filled. There was no evidence of fluid leakage. ATL FSDO checked the gauge against the nitrogen bottle with calibrated gauges in the AirTran supply room with the following results:

<u>STANDARD</u>	<u>SUSPECT GAUGE</u>
50psi	46psi
100psi	98psi
150psi	150psi
200psi	205psi
250psi	255psi

The allowed tolerance for this gauge is + or -25%. This gauge was well with in tolerance. The gauge in question was not being used at the time it was discovered . The airline currently has the same method in place to check tire pressure gauges before they leave the tool room as they did during the NASIP. AirTran uses a nitrogen bottle with dual calibrated gauges to check each tire gauge before it is issued. The Atlanta FSDO did not discover evidence to substantiate this finding.

Finding closed.

**2.06.05:** A base inspection at the Ft Lauderdale facility revealed six (6) open “O” ring packages located in a filing cabinet, contrary to AirTran Airlines Standard Practice 8225.4(a)(1)(a)(b)(c).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.06.05 and reviewed all the relevant documentation. Inspectors interviewed AirTran Airlines Stores’ personnel concerning this finding. The investigation revealed that the O-rings did go through the AirTran Airlines Receiving Office in Atlanta and were forwarded to the Fort Lauderdale station in accordance with the established AirTran Airlines procedures. It was also determined that the certification for these O-rings was on file in the AirTran Receiving Department. AirTran Airlines elected to discard the six (6) O- rings because the packages had been open. Additionally, AirTran Airlines clarified their parts handling procedure by revising Standard Practice 8110.3. This revision clarifies the handling of the certifications of those parts by defining the procedures for the distribution of the certifications and packaging / marking of the parts. The revision was received and accepted by the Atlanta FSDO on January 22, 1998.

Finding Closed.

**2.06.06:** Also in Fort Lauderdale, inspection revealed five (5) gaskets, part number 182888, in an unmarked plastic bag. Stores personnel could not produce paperwork to show traceability, contrary to AirTran Airlines Standard Practice 8110.3(a) 4 note.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO office have investigated finding 2.06.06 and reviewed the applicable documentation. According to AirTran Airlines Standard Practice 8110.3 and 8110.4, consumable / expendable parts do not require individual component documentation. All incoming materials are inspected at the official receiving point at the Atlanta Store Facility for serviceability and proper documentation. Once these requirements are met, the materials are then placed into the inventory.

To further clarify this procedure, AirTran Airlines has revised Standard Practice 8110.3. The revision was received by the Atlanta FSDO on January 22, 1998 and has been accepted. The revision clarifies the procedures affecting consumable / standard commercial parts as well as the handling and certification of those parts.

Finding closed.

**2.06.07:** Aircraft batteries are stored up to three (3) months before being issued. At a self-discharge rate of 1.2 percent per day, the battery would be rated at 84.52 percent on the fifteenth day. The General Electric Overhaul Manual for aircraft battery part number 43B034LB03, dated May 5, 1970, states a standby charge is required to maintain its full rated capacity. The practice of storing a battery in excess of 15 days is contrary to 14 CFR Part 43.13(c) and the General Electric Overhaul Manual, dated May 5, 1970, page 901, section 24-30-02.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO thoroughly investigated finding 2.06.07 and reviewed all relevant documentation, including a discussion with the battery manufacturer.

On November 4, 1997 (three days prior to the conclusion of the NASIP inspection), the battery manufacturer issued a statement via facsimile to the Atlanta FSDO, the NASIP Team and the NASIP Team's Maintenance Coordinator. This facsimile clarifies the disposition of this finding. This memorandum indicates that:

“Page 901 of the Component Maintenance Manual (CMM) for the 34LB03 battery states that the battery is not required to be trickled charged (section 10 A). Furthermore, this page gives the limitations of the battery if not stored with trickle charging and the procedures for trickle charging should the operator choose to trickle charge.”

A trickle or stand-by charge, which is an optional charging method to keep the nickel-cadmium (ni-cad) battery at its full rated electrical capacity, is a procedure not required by the manufacturer's component maintenance manual. The accepted ni-cad battery storage procedure, as stated in AirTran's FAA accepted General Maintenance Manual (GMM), does not include trickle charging. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

*ATL FSDO Notes:*

- 1) Saft Aviation Battery acquired General Electric's (GE) aircraft battery division in approximately 1989. GE's CMM is applicable to this specific battery.*
- 2) Trickle charge and stand-by charging are technically synonymous terms which are charging methods used to keep stored aircraft ni-cad batteries at their fully rated electrical capacity.*

**2.06.08:** Inspection revealed three (3) transponders (part number 622-2224-001) in the Atlanta stores warehouse were out of certification. The shelf life is 24 months. The certification dates on the transponders were 3/22/93, 8/19/94, and 6/22/95. This is contrary AirTran Standard Practice 8225.5 and 8110, page 2, paragraph(3)(e).

**CORRECTIVE ACTION:** Atlanta FSDO Personnel investigated finding 2.06.08 and found that the transponders in question were immediately, upon the discovery of the discrepancy, put in quarantine. The certification date put on the transponders was the “sold” date to AirTran Airlines. The Inspection Department has retrained the receiving inspector on the proper procedure for checking shelf life items. AirTran Airlines has also issued an Alert Notice, number 02-98 dated 01-22-1998. This Alert Notice establishes procedures for completing AirTran Equipment Transfer Record (ETR) form. ATC transponders are required by Federal Aviation Regulations (FAR) 14 CFR 91.215, (FAR) 91.413 to be tested and inspected after installation. AirTran Airlines installs and checks the transponders using the AirTran Airlines General Maintenance Manual (GMM) based upon the McDonnell-Douglas Maintenance Manual. The procedure defined in Alert Notice 02-98 will be incorporated into a GMM / Standard Practice revision approximately March 9, 1998. No impact on air safety was discovered as a result of this discrepancy.

Finding Closed.

*ATL FSDO Note: The Atlanta FSDO's investigation of the findings listed in section 2.06 “Maintenance Facilities” revealed no systemic problems in this area.*

**CONTRACTUAL ARRANGEMENTS****2.07****DESCRIPTION:**

AirTran Airlines contracts with numerous vendors as listed on page D091 of their Operations Specifications. Section 8180 of AirTran Airlines GMM describes in detail how all contract maintenance is accomplished. The Vice President of Quality Assurance or the Chief Inspector is charged with managing this program.

**INSPECTION DATA:**

The team visited three contract maintenance providers to ascertain conformance to the AirTran Airlines General Maintenance Manual and adherence to the Federal Aviation Regulations. AeroCorp Macon of Macon GA, AeroCorp of Lake City, FL and Leading Edge Aircraft Painting of Greenville, MS were evaluated. Performance Aircraft Services Dallas, TX, performs fuel tank field maintenance for AirTran at the AeroCorp at Macon Repair Station Facility and is on call for field services at other stations.

**FINDINGS:**

**2.07.01:** The Performance Aircraft Services (CRS P8FR) supervisor could not produce a confined space entry procedures manual, yet work had already begun on the aircraft fuel tanks. This action is contrary to 14 CFR Part 121.367(a) and AirTran Airlines GMM Standard Practice 8071.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.07.01 and reviewed all relevant documentation.

The Item of Proof in this case is an inspector's statement from the NASIP Inspector. It states that on October 28, 1997, He observed that the fuel tanks were open on aircraft N906VJ. Additionally, he states that Performance Aircraft personnel were working on the aircraft. He does not state that he observed anyone working **in** the fuel tanks. A second NASIP Inspector was present during this finding. The statement from this second inspector states that he did not remember seeing anyone in the fuel tanks.

A statement was obtained from Performance Aircraft indicating they had not entered the fuel tanks prior to the close of business on October 29, 1997.

There is no evidence to show that anyone was observed working **in** the fuel tanks. Work can be accomplished on the aircraft without a tank entry permit, provided that personnel are not physically in the tank. AirTran Airlines has "Confined Space Entry" procedures in Standard Practice 8071.

Finding closed.

**2.07.02:** During the rudder installation on N902VJ the installation procedures were not followed correctly. Upon further discussion with the General Manager it was determined that rudder installations performed at Leading Edge on all the previous AirTran aircraft had also been installed incorrectly. This is contrary to 14 CFR Parts 43.13(b) and (c) and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO took immediate action when notified of this discrepancy. An inspector from the FSDO was sent to Leading Edge Aircraft Painting to verify the finding on October 29, 1997. The FAA Principal Maintenance Inspector (PMI) notified AirTran Airlines to re-inspect all affected aircraft rudder installations to ensure that air safety was not compromised. Aircraft N921VV was re-inspected with an inspector present from the Atlanta FSDO on October 30, 1997 and a review of the remaining 11 aircraft records indicate all had been returned to service after re-inspection by November 5, 1997.

Additionally, AirTran consulted with and received direction from Boeing Commercial Aircraft Group, Products Support Division in the form of facsimiles SEQUENCE NO: 9704315 and 9704534. Their position based upon the detailed information provided was that this discrepancy did not affect air safety. Enforcement Investigative Report (EIR) number 98SO110028 was initiated to investigate AirTran Airlines for the apparent inadequate oversight of a contractor / aircraft maintenance repair station. Also, EIR number 98SO110029 was initiated on Leading Edge Aircraft Painting Inc. for the apparent lack of compliance with AirTran Airlines' Maintenance Manuals.

Finding closed.

**2.07.03:** Personnel utilized Leading Edge inspection stamps in lieu of signatures for work accomplished at their facility. Leading Edge has never received approval from AirTran to do this. This is contrary to 14 CFR Parts 43.13(c) and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the FSDO investigated finding 2.07.03 and reviewed all applicable documentation. AirTran Airlines corrected this finding on December 16, 1997 by issuing a letter authorizing Leading Edge Aircraft Painting to use stamps for work sign-off in accordance with their General Maintenance Manual and Standard Practice procedure 8103. Enforcement Investigative Report 98SO110028 filed.

Finding closed.

**2.07.04:** On 9/21/97 aircraft N936VJ was returned to service after a rudder installation with the required inspection being performed by the same person who performed the rudder installation. This is contrary to 14 CFR Parts 121.371(c) and 121.367(a).

*ATL FSDO Note: Investigation found that the finding is for N936VV not N936VJ.*

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.07.04 and reviewed all pertinent documentation. A review of aircraft N936VV's log page 50964-31 dated September 21, 1997, disclosed that there was not a sign-off for the inspection for the rudder installation. Further investigation of AirTran Airlines Work Order 26919, dated September 21, 1997, applicable to aircraft N936VV, revealed that a different person, who was trained as a RII inspector, had signed for the inspection on this Work Order. However, AirTran Airlines procedures requires that only the Aircraft Log Page be completed by the mechanic and the inspector (these signatures may not be from the same person). Thus, even though the correct inspection was recorded on an AirTran Airlines Work Order, the Atlanta FSDO concurs with the NASIP finding that the aircraft log page was not properly completed.

Additionally, all work was re-inspected by AeroCorp, a certificated repair station located in Lake City, Florida, with AirTran Airlines oversight. The work is signed off by a mechanic and inspector on log page 51101-46 dated November 01, 1997.

Enforcement Investigative Report (EIR) 98SO110028 was initiated against Leading Edge Aircraft Painting, Inc., for a possible improper certification of the aircraft log page. EIR number 98SO110029 was initiated against AirTran Airlines for possible inadequate oversight of an aircraft maintenance repair station.

Finding closed.

**2.07.05:** During an inspection of a contract maintenance facility, AeroCorp, at Lake City, FL, the following was observed. A second contract vendor, Performance Aircraft Services, was entering a fuel tank on AirTran aircraft N919VV without wearing clean white overalls, or head and shoe coverings as required by Douglas Structural Repair Manual, 51-21-0, page 1. This is contrary to 14 CFR Parts 43.13(c) and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.07.05 and reviewed all of the relevant documentation. AirTran Airlines adopted the Douglas Structural Repair Manual and the Douglas Maintenance Manual into their manual system. The Structural Repair Manual (SRM) is the FAA approved document to be followed when structural repairs are required. The Maintenance Manual is the document to be followed in the performance of inspections and non structural repairs. The requirements for appropriate clothing, differs between these 2 manuals.

Performance Aircraft Services, a Part 145 certified repair station, performs only fuel tank leak checks and sealing of fuel tanks in accordance with the Douglas Maintenance Manual. Therefore, they were following the guidelines set forth in the AirTran Airlines and Douglas Maintenance Manuals. Performance Aircraft Services does not perform structural repair work. Thus, they would not be utilizing the procedures contained in the Structural Repair Manual alluded to by the NASIP finding.

McDonnell Douglas is working with the FAA Aircraft Certification Office to standardize the type clothing to be worn when entering aircraft fuel tanks regardless of maintenance manual reference. In the interim, AirTran Airlines has adopted Douglas Process Specification 2.49, paragraph 5.8.

This specification, dated October 11, 1996, provides guidance on fuel tank entry procedures, including proper clothing attire. This follow up investigation did not disclose evidence to substantiate the NASIP finding of a violation of the Federal Aviation Regulations.

Finding closed.

**MEL/DEFERRED MAINTENANCE****2.08****DESCRIPTION:**

AirTran Airlines MEL/CDL and Deferred Maintenance Program consist of three (3) standard practices; NON-MEL/CDL Deferred Maintenance (8218), Aircraft Dents Deferral Procedures (8219) and use of MEL and CDL. The combination of these three (3) standard practices provide guidance and procedures necessary to meet the requirements of 14 CFR Part 121.

**INSPECTION DATA:**

The Master Minimum Equipment list (MMEL), dated 6/20/96, Rev. 38, was compared to the AirTran Airlines Minimum Equipment List (MEL), dated 9/15/97, Rev. 30, the Aircraft Operating Manual, the Pratt & Whitney Engine Manual #481672 and AirTran Airlines Standard Practice NON-MEL/CDL Deferred Maintenance 8218.1 and 8218.2.

**FINDINGS:**

**2.08.01:** A review of AirTran Airlines deferral practices indicates a wide deviation from those allocated by the MMEL and CDL. Standard Practice 8218, titled “NON-MEL/CDL Deferred Maintenance” under 8218.1 AirTran Airlines “Deferrable Item (DI) identifies Minor Discrepancies”. Under 8218.2, “Deferrable Item (DI) identifies Minor, Serious in nature maintenance items” Under 8218.2A(1)(A)-4, “Has no published Limitations”.

The E.P.R. indicator has no published limitations with the exception of the digital counter on the lower face of the indicator, and therefore, must be fully operational with the exception of the digital counter.

In reviewing AirTran Airlines “Maintenance Completion Report”, dated 10/23/97, of 42 pages, 153 (DMI) and (DI) item, ATA-77, “Engine Indication”, primarily addressing the E.P.R. system on AirTran Airlines fleets from 1/1/97 through 10/25/97. In particular, page 13, aircraft N916VV, which has the E.P.R. indicator carried as a (DI) since it is not completely operational, “rises to 2.3 on its own during cruise”, and the N1 indicator carried as a (DMI) as a MEL item. Both items are applicable to the number 1 engine. This is contrary to MEL procedure under 14 CFR Parts 121.627(b) and 121.628 (a)(3)(5). Section 8218.1 and 8218.2 instructions under AirTran Airlines Standard Practices allows for less restrictions than authorized by the MMEL.

With this situation AirTran Airlines does not comply with Pratt/Whitney Manual (P/N 481672) page 5-10-00, page 808, dated 10/1/87. “If the aircraft engine pressure ratio gauge is out, that cycle should be recorded as using 100% maximum rated take-off thrust”. AirTran Airlines has no procedure in their manual(s). This is contrary to 14 CFR Part 121.153(a)(2).

Multiple instances are noted on the AirTran Maintenance Completion Report wherein the corrective action taken, after several deferrals, was the proper positioning of the N1 gear box fairing (bullet) to clear the P2 line drain. Also several instances of circuit breaker replacement are evident to clear instrument discrepancies. The entire MCR report has items documented as corrective action inappropriate to the discrepancy.

*ATL FSDO NOTE: The finding inspector mentions the acronym (DI) meaning a “deferred item,” when in fact (DI) means a “Pilot write-up.” Atlanta FSDO investigation determined that the acronym “DI” was not defined in the AirTran Airlines manuals. AirTran Airlines revised their standard practice manuals to include definitions for acronyms they used.*

**CORRECTIVE ACTION:** The function of the Minimum Equipment List (MEL), is a manufacture recognized and FAA approved methodology to permit aircraft to be flown safely with certain equipment inoperative. The function of NON MEL/CDL deferral is a method to allow deferral of items that are still airworthy, and within serviceable limits, but are in need of repair.

This NASIP finding states that after a review of the AirTran Airlines Maintenance completion report, it was noted that the left engine EPR indicator was being carried as a deferred item because it rises to 2.3 on its own during cruise. Also, the N1 indicator was being carried as a MEL item. This is not a completely true or accurate statement. On log page, 51039-28 the write-up states that the EPR rises 2.3. The corrective action before the next flight was to remove and replace the EPR indicator, the system was checked and was found to be operating per the maintenance manual.

The NASIP inspector stated:

“if the aircraft engine pressure ratio (EPR) gauge is out, that cycle should be recorded as using 100% maximum rated take-off thrust,”

In regard to this allegation, the Pratt and Whitney Manual was cited as the requirement. AirTran Airlines does not authorize operation of aircraft with an inoperative EPR gauge. Therefore, this Pratt and Whitney requirement is not applicable. To enhance their procedure, AirTran Airlines has issued AOM Bulletin 97-5, which is intended to be incorporated into Chapter 3 of the AOM. It states:

“that full-rated thrust will be noted in the Take Off Power Block” of the logbook.

The “Maintenance Completion Report”, that was being reviewed by the NASIP team member is an all encompassing report that includes such things as mechanical interruptions, pilot reports, MEL/CDL’s, etc. On the page in question, page 13 (Item of Proof 1), the report lists the Number 1 engine N1 tachometer inoperative on aircraft N916VV. It was properly deferred per MEL 77-3 on AirTran Deferred Maintenance number DM12203.

No documentation could be found to indicate that AirTran deferred an EPR indicator. Out of 153 discrepancies on 26 aircraft, 3 aircraft had circuit breakers replaced, and 4 aircraft had the N1 gear box fairing (bullet) replaced to correct a discrepancy. These discrepancies do not appear to be excessive nor systemic. Therefore, this finding could not be substantiated.

Finding closed.

**2.08.02:** NON-MEL/CDL Deferred Maintenance Item, control number DS06134 corrective action scheduled beyond the next “B” check without the Director of Maintenance signed stipulation on the non-routine hard copy, that continuing deferral would not affect Airworthiness and nothing to indicate that this continuing action had the Vice President of Maintenance final approval.

The deferral open date is 9/9/97, scheduled corrective action time is next engine change “B” check accomplished 10/8/97. This is contrary to the requirement of AirTran Airlines Standard Practice 8218.2 (b)(2), which states that corrective action will not be schedule beyond next “A” or higher check without Director of Maintenance, or in his absence, his qualified (A&P) designee, sign and stipulate on the non-routine hard copy, continuing the deferral will not affect Airworthiness. Additionally, the procedure states that final approval by the Vice President of Maintenance is required.

**CORRECTIVE ACTION:** Investigation by the Atlanta FSDO determined this discrepancy was the result of an administrative oversight. This occurrence was the only incident discovered by the FSDO during the subsequent investigation. Review of approximately 10 other deferred maintenance item hard copies showed no deficiencies. This administrative oversight was corrected by AirTran Airlines after a discussion with the Atlanta FSDO. The airlines’ error to sign this one document was contrary to AirTran Airlines’ procedures, but is not evaluated as a systemic problem and is not considered a violation of the Federal Aviation Regulations (FAR).

Finding closed.

**2.08.03:** NON-MEL/CDL Deferred Maintenance Item, control number DS05798, corrective action scheduled beyond next “B” check with no non-routine hard copy with Director of Maintenance signed stipulation, that continuing the deferral will not affect Airworthiness and nothing to indicate this continuing deferral action had the Vice President of Maintenance final approval included in “B” check package. The deferral open date is 6/18/97, scheduled corrective action time is next “C” check, “B” check accomplished 10/22/97. This does not satisfy the requirements of AirTran Airlines Standard Practice 8218.2 (b)(2).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.08.03 and reviewed all the appropriate documentation and the subject deferred maintenance item sheet. The required signatures were on the form. The NASIP team did not provide an Item of Proof for this finding. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.08.04:** The following ATA systems and sequence number listed in AirTran Airlines MEL , page 03, manual, do not apply to AirTran Airlines aircraft, however, AirTran Airlines MEL does not carry the notation “Not applicable to AirTran Airlines Fleet”.

This is contrary to a statement contained in AirTran Airlines MEL introduction:

1. 21-21
2. 22-15
3. 27-37
4. 27-37
5. 28-8
6. 31-5
7. 33-7(4)
8. 33-21
9. 34-4

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated and reviewed finding 2.08.04, and reviewed all appropriate documentation, including AirTran Airlines procedures and the DC-9 master minimum equipment list (MMEL). The Item of Proof provided by the NASIP team contains the proper and correct notations. AirTran Airlines' MEL is in accordance with the DC-9 master minimum equipment list. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.08.05:** Reviewing the MEL/CDL revealed the following:

1. Maintenance Scheduling Report, Dated 10/29/97, DMI 2956, ATA 26-10, 10/28/97, Loop-A and Loop-B Test Systems. MEL items 26.1.2, states "one may be inoperative, on an inoperative loop". The DMI should state, "the inoperative unit, not both A&B.
2. Maintenance Scheduling Report, Dated 10/29/97, DS 6299, ATA 27-80, 10/29/97 Leading Edge Slats and DS 6300, ATA 27-80, 10/29/97 Leading Edge Slats.  
Reviewed the Maintenance Detail Reports. DS 6299, ATA 27-80, RH - Wing #2 Slat Seal missing. DS 6300, ATA 27-80, LH - Wing #4 Slat Seal missing. Reviewed MEL section, under chapter ATA-27, There is no area that addresses the Leading Edge Slat Seals. No ATA-57 in this section. Reviewed CDL section, under chapter ATA-57-3, 57-55-01, Leading Edge Slat Horn Seals, "one may be missing".
  - Performance limited weight must be reduced by:
    - Take-off 700 lb./Seal
    - Enroute 700 lb./Seal
    - Landing 500 lb./Seal

The aircraft is flying the line at the present time. If in fact the above CDL does apply, only "one" seal is allowed to be missing,. If the CDL does not apply to the Slat Seals identified, there is not relief offered in either ATA chapter 27 or 57 and therefore, the Seals must be in place.

With the aircraft flying, per the CDL, the weight penalty is not identified, see attached Dispatch Release. With reference to the acronym's "DS", it is not identified in the GMM Standard Practices. 14 CFR Part 121.135(a)(1).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.08.05 and reviewed the applicable documentation. The first issue under 2.08.05 deals with fire detection loops being deferred on aircraft N922VV on October 28, 1997. The deferred item number was DM12956. The NASIP finding states that the deferred maintenance item(DMI) should state, “the inoperative unit”,..... not, “both A&B”.

As for the first issue, the NASIP team provided, as Items of Proof, a copy of AirTran Airlines’ Maintenance Scheduling Report (MSR), which references the Deferred Maintenance (DM) number for the item deferred. Also provided was a copy of AirTran Airlines’ Dispatch Release for N922VV which clearly shows only “R/eng (right engine) B fire loop inop (inoperative).” However, the NASIP inspector apparently did not follow the AirTran Maintenance system with the DM number shown on AirTran MSR to review the AirTran Maintenance Control Master File (MCMF) for aircraft N922VV. This file indicates the actual circumstances of the deferral of the engine fire loop.

The AirTran Airlines MCMF is divided into two sections. The first section is titled “Document Information” and records, among other things, the Minimum Equipment List (MEL) Air Transportation Association of America (ATA) code and the system item as shown on the MEL (In this case, the loop A and B test system). The second section is titled “Origination Information” and documents the exact maintenance discrepancy as recorded in the aircraft log book as well as the log book page number of the discrepancy.

In this instance, the Origination Information section reveals the log book write up “r / eng (right engine) B system fire loop will not test.” This clearly demonstrates that only the right engine B loop was recorded and deferred, not both A and B loop systems. The corresponding original aircraft log page was reviewed and found to match the MCMF. Thus, the follow up investigation did not disclose evidence to substantiate this segment of the NASIP finding.

The second issue in this finding deals with leading edge slat seals deferred under AirTran Airlines’ Non MEL/CDL deferral procedures found in Standard Practice (SP) 8218. The seals were deferred on DS6299 (right wing) and DS6300 (left wing) on October 29, 1997. On November 21, 1997, following a conversation between the Atlanta FSDO and the McDonnell Douglas Aircraft Representative assigned to AirTran Airlines, the representative made a request to Douglas Aircraft in Long Beach, California to provide edification and clarification on deferral of slat seals. On November 24, 1997, Douglas Aircraft responded that the seals could be deferred, with certain limitations. The FAA’s Aircraft Evaluation Group (AEG) in Long Beach concurred with the Douglas response. Although AirTran Airlines Maintenance had not previously confirmed the regulatory compliance of deferring these leading edge slat seals, the repair deferral was subsequently verified to be within the established provisions, and, therefore no regulatory violation had occurred. During the ensuing period, the airline’s maintenance officials were counseled by the Atlanta FSDO to, in the future, take whatever steps are necessary to ensure that their repair activities are absolutely within compliance prior to taking the action.

The FAA’s Aircraft Maintenance Division (AFS 300) reviewed AirTran Airlines’ non MEL deferral process in July 1997 and, in a memorandum dated July 2, 1997, stated that the airlines’ procedure appears to address all the requirements of the regulations. Thus, the follow up investigation also did not disclose evidence to substantiate this second segment of the finding.

The third issue under 2.08.05 addresses the issue of the acronym “DS” not being identified in the Standard Practices. This segment is a duplication of NASIP finding 2.03.07. AirTran Airlines’ Standard Practices 8720.2 and 8015 has been revised as of December 1, 1997 to include the definition of DS. This issue of the third segment of this NASIP finding has been corrected.

Finding closed.

**WEIGHT AND BALANCE PROGRAMS****2.09****DESCRIPTION:**

AirTran Airlines weight and balance program is controlled by Standard Practice 8090, dated 10/1/97, and Operations Specification Paragraph E96, dated 2/10/89, and revision number seven (7), dated 10/3/97.

**INSPECTION DATA:**

Ramp and enroute inspections were conducted on several company aircraft and weight and balance records were evaluated to ascertain conformance to GMM procedures.

**FINDINGS:**

**2.09.01:** During a routine ramp inspection of AirTran N923VV 10/21/97, at the Atlanta Hartsfield Airport, the following weight and balance discrepancy was noted. Numerous sand bags were installed in the forward cargo compartment as ballast, as explained by the captain. There were more than 12 bags of ballast in the forward cargo compartment of the aircraft at the time of the ramp inspection.

Ballast was not loaded in accordance with AirTran's approved Weight and Balance Manual (WB), report number 930115, revision 7, dated 10/03/97. Page 19, paragraph 23, the last paragraph states in part "All cargo loaded in each compartment must be uniformly distributed throughout each compartment". Page 54, paragraph 34(B) states "When ballast is loaded in the FWD cargo compartment it is treated as FWD cargo in completing form VJWB 102".

AirTran has not complied with their program by not following the procedure to evenly distribute the cargo (ballast) in the cargo compartment. In addition there are no instructions in the weight and balance manual to restrict and distribute the weight to accommodate floor loading.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.09.01 and reviewed the applicable documentation. The AirTran Airlines Weight and Balance Manual delineates the procedures the operator will employ whenever the use of Ballast is needed. Page 53 of the Weight and Balance Manual states whenever ballast is loaded in the FWD cargo compartment it is treated as FWD cargo in completing the Weight and Balance Form (VJWB102). Form VJWB102 is the Weight and Balance and Performance Form used for adjustment of "ballast weight" and "moment index" to ensure the flight crew that the aircraft is within operating limitations. It was never the intent of AirTran Airlines to use the phraseology on page 19 paragraph 23 of the weight and balance manual stating that:

"All cargo loaded must be uniformly distributed throughout each compartment."  
to include Ballast (Ballast is not cargo).

The cargo compartments are considered as one area or zone for weight and balance computation purposes. In determining the moment arm and percentage of the Mean Aerodynamic Chord (MAC) for this specific aircraft, the precise location of specific items within the cargo compartments has been deemed as not a factor as long as the placard floor loading limits are not exceeded.

The Atlanta FSDO has not discovered any instances where these limits have been exceeded.. Nevertheless, AirTran Airlines has agreed to publish a Weight and Balance Manual revision stating:

“All cargo loaded in each compartment must be uniformly distributed throughout each compartment except in the case where Ballast is used. Ballast shall be loaded in a position as not to interfere with normal cargo loading and unloading.”

The Atlanta FSDO accepted the Weight and Balance Manual revision on February 6, 1998. Thus the Atlanta FSDO's follow-up investigation did not disclose any evidence to substantiate the NASIP finding.

Finding closed.

**2.09.02:** Weight and balance procedures specified in AirTran Standard Practice 8090 were not followed concerning the aircraft repainting at Leading Edge Inc. Form VJ-M035 was not processed and changes to the weight and balance records for aircraft painted at Leading Edge prior to 10/21/97 were not created until 10/24/97. This is contrary to AirTran Standard Practice 8090 and 14 CFR Parts 121.135(b)(20) and 121.367(a).

**CORRECTION ACTION:** Personnel from the Atlanta FSDO investigated finding 2.09.02. The AirTran Airlines Engineering Department makes the determination if the VJ-M035 form (Weight Change Notification) should be processed per their Standard Practice 8090. AirTran Airlines developed their weight and balance program from the guidance delineated in Advisory Circular 120-27C. The circular defines the procedures by which air carriers should control their weight and balance programs. Paragraph 7 of the Advisory Circular states aircraft should be reweighed if changes of plus or minus ½ of 1 percent of the maximum landing weight from the established operating fleet weight are exceeded. AirTran Airlines Engineering determined, prior to any aircraft painting at Leading Edge Aircraft Painting , that, with the removal of paint and adding of new paint, the total addition of 79 pounds spread evenly over the entire aircraft did not exceed ½ of 1 percent of the maximum landing weight. Thus the added weight was negligible and did not require VJ-M035 to be processed. The weight change was noted in each aircraft weight log on VJ-MO32 (AirTran Aircraft Weight Log). The FAA Aircraft Evaluation Group of Long Beach concurred with this analysis by electronic mail on December 17, 1997. Thus, the FSDO's follow-up investigation did not substantiate the finding.

Finding closed.

**AIRWORTHINESS DIRECTIVES COMPLIANCE****2.10****DESCRIPTION:**

AirTran Airlines Airworthiness Directive (AD) Compliance Procedures are outlined in Standard Practices, Section 8040. This document states that the Technical Publications Department (TP) will receive all ADs and log them. TP will route the ADs to the Vice President of Quality Assurance and the Director of Engineering. An Additional copy will be routed through the Vice President of Maintenance, Director of Planning and Control, Director of Power Plant and Landing Gear, Director of Maintenance, Manager of Quality Assurance and Chief Inspector.

**INSPECTION DATA:**

AirTran Engineering Department is charged with evaluating ADs for applicability to AirTran Airlines equipment. AD requirements were assessed against AD records to determine compliance.

**FINDINGS:**

**2.10.01:** The monitoring and control of AD Compliance AD 91.24.14. No 4 ½ bearing spacer and Seal was reviewed. JT8D-9A, S/N 657608 was overhauled by Air New Zealand. The shop card 597143, second side block a-A and 1-B addressed the seal, but did not address the AD.

Shop card 300551 was not in the engine record/build package. Air New Zealand failed to put this card in the package and the error was not detected by the AirTran audit of the engine work package.

The NASIP inspector inquiry of the missing documentation resulted in the information being sent to AirTran. The carrier could not verify AD compliance or the current status of AD 91-24-14 which is contrary to 14 CFR Part 121.380(a)(vi).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.10.01 and have reviewed all relevant aircraft maintenance records pertinent to this finding. AD 91-24-14 was properly recorded in accordance with AirTran Airlines policies, procedures and FAR requirements.

A review of Airworthiness Directive (AD) 91-24-14 for the JT8D-9A powerplant, serial number 657608 was performed during the NASIP inspection. During this inspection, a NASIP inspector determined that AirTran Airlines could not verify AD 91-24-14's compliance or current status. However, the Atlanta FSDO's investigation discovered that the airline's personnel did verify the status of AD 91-24-14 for the NASIP Inspector.

The NASIP Inspector insisted on reviewing the actual “dirty fingerprint” (traceability of a document to the original record) copy of the performance of AD 91-24-14. AirTran personnel notified the NASIP Inspector that task card # 59143 was for spacer part number 538953, not spacer 525961. This spacer (part number 538953) has no AD applicable to it. It should be noted that the NASIP inspector stated that shop card number 597143 (for spacer 538953) did not address AD 91-24-14.

Blocks 1A (which was misidentified in the NASIP findings as “Second Side Block a-A) and 1B of this shop card refer to inspections performed to spacer Part number 538953. AD 91-24-14 is not applicable to this part number (#538953) spacer. There is no AD applicable to this specific component.

An investigation into this matter has determined that the backside of inspection card number 3000551 (which had been misidentified as “300551” in the NASIP finding) for the 4½ spacer was not copied during the powerplant’s record processing at Air New Zealand’s facility. This portion of the task card was sent via facsimile to AirTran Airlines Maintenance. This inspection card documents the “dirty fingerprint” record of work accomplishment for compliance of AD 91-24-14.

The investigation performed by the Atlanta FSDO also disclosed that AD 91-24-14 was documented in AirTran Airlines’ Powerplant (serial number 657608) Records Package in the following three (3) locations: (1) “Airworthiness Directive Compliance Summary,” (2) on AirTran module AD listing and (3) on AirTran Airlines’ “Maintenance Control Audit Report” showing its current status and tracking by AirTran Airlines’ tracking and retrieval system.

AirTran Airlines was able to verify compliance and current status of AD 91-24-14 at the time of the NASIP inspection. No violation of FAR 121.380(a)(vi) was discovered. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

## **MAINTENANCE PROGRAMS**

### **2.11**

#### **DESCRIPTION:**

AirTran Airlines has an approved maintenance program identified in the Operations Specifications containing aircraft maintenance general requirements and a Continuous Airworthiness Maintenance Program. The company utilizes a paper based system to track maintenance. A computer system (CMS) is used to record all maintenance actions and the tracking of repetitive maintenance and life limited components. The CMS has become the primary repository for information although there is no evidence that the FAA has ever evaluated the CMS system for use by AirTran.

#### **INSPECTION DATA:**

The CMS was evaluated as to its effectiveness in identifying maintenance requirements. The data runs were evaluated against hard copy reports and in many instances, were found lacking. One set of engine records were inspected for completeness.

#### **FINDINGS:**

**2.11.01:** During a spot inspection of AirTran Airlines DC-9 #906, a discrepancy was noted involving the fuel system maintenance being performed by Performance Aircraft Services (PAS) of Dallas, Texas (P8FR).

PAS is contracted by AirTran Airlines to maintain fuel systems. Maintenance planners related that PAS uses their own maintenance procedures. In discussions with the Manager of AirTran Airlines Approved Maintenance Program, he stated that PAS used a procedure that was superior to the aircraft maintenance manual and contained procedures that were not contained in the aircraft maintenance manual.

The PAS Maintenance Lead in Macon, GA, stated that PAS follows the maintenance procedures outlined in McDonnell Douglas Maintenance Manual. He went on to explain that the maintenance procedure listed on their FAA Operations Specifications are used only when there is no manufacturers data to substantiate the maintenance being performed.

AirTran Airlines has no fuel tank maintenance program in their approved program. AirTran Airlines lacks an adequate aircraft maintenance program which is contrary to 14 CFR Part 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.01 and have reviewed all pertinent documentation. AirTran Airlines has two standard practices (SP) in their General Maintenance Manual(GMM) pertaining to fuel tank entry. SP 0554 details confined space entry procedures. SP 8071 defines aircraft fuel tank entry procedures.

To improve the program, AirTran Airlines submitted a revision of SP8071 to the Atlanta FSDO and devised work cards to be used for tank entry. The revision was submitted and accepted on February 6, 1998. With regard to the NASIP finding that AirTran Airlines has no fuel tank maintenance program, the airline adopted the Douglas Structural Repair Manual for Structural Repair and AirTran Airlines' Maintenance Manual chapter 28 for guidance to perform fuel system maintenance. In reference to the NASIP finding, AirTran Airlines lacks an adequate aircraft maintenance program, the Atlanta FSDO was unable to substantiate this finding.

Finding closed.

**2.11.02:** On 10/24/97, at Atlanta, GA, during a preflight inspection of aircraft N907VJ prior to conducting an enroute inspection, it was discovered that the cockpit jump seat had the wrong seat belt installed. As the aircraft did not conform to its type design at this time, this could have led to non-compliance with 14 CFR Parts 43.13(c) & 121.367(c).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.02 and reviewed all appropriate documentation. The aircraft was operated after the jumpseat was properly deferred in accordance with AirTran Airlines MEL. The cockpit jumpseat lap belt (P/N 1101283-15) was removed and a proper belt was installed. Belt (P/N 1101283-15) was an approved belt, but not for this aircraft. The difference being that this belt is a shorter than the required belt. A fleet campaign was completed on January 10, 1998, and AirTran Airlines found no more improper part numbers installed. Enforcement Investigative Report (EIR) 98SO110023 was filed.

Finding closed.

**2.11.03:** During a review of aircraft N931VV, a DC-9-32, records, it was noted that on AirTran Airlines flight log page no. 51190-31, maintenance personnel discovered the cabin temperature control sensor was the wrong part for this aircraft. This is contrary to 14 CFR Parts 43.13(b)(c), and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the FSDO investigated finding 2.11.03 and reviewed all appropriate documentation including Engineering Bulletin #14EB97, dated February 27, 1997. The engineering bulletin provided information stating that the cabin temperature control sensor was an equivalent replacement part for installation in DC9-32. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.11.04:** During a review of aircraft, N907VJ, a DC-9-32, records, it was noted on AirTran Airlines flight log page 50966-02, dated 10/24/97, item 2m, the mechanic lubricated the rotating mechanism in the lower rotating beacon per Maintenance Manual 33-40-0, page 1 and 33-42-0. This is contrary to AirTran Airlines DC-9 maintenance manual, 14 CFR Parts 43.13(c), 121.363(a) and 121.367(a)(b)(c).

**CORRECTIVE ACTION:** The Atlanta FSDO investigated finding 2.11.04. The investigation revealed the use of dry type lubricant is a standard industry practice in aircraft maintenance except where prohibited by the aircraft maintenance manual or the manufacturer. The reference to the maintenance manual was appropriate for the removal and installation of the rotating beacon. AirTran Airlines contacted the manufacturer of the anti-collision light assembly for clarification and received a facsimile dated January 14, 1998, stating that the use of the dry type lubricant on the gear train would not impede the function or reliability of the unit. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.11.05:** Review of AirTran Airlines aircraft N949VV, a DC-9-32, revealed that on log page 50991-09, dated 9/24/97, item 5M, the number one (1) aircraft battery was changed. This is contrary to the DC-9 Maintenance Manual 24-30-1, page 401, which states, in part, "If one battery is to be replaced, both batteries must be replaced", 14 CFR Parts 43.13(c), 121.363(a) and 121.367(a)(b)(c). Additionally, a battery removal history report printed from 6/1/97 to present revealed 21 other instances of single battery replacements.

**CORRECTIVE ACTION:** The Atlanta FSDO investigated Finding 2.11.05 and reviewed all associated documentation including AirTran Airlines Battery Removal History and aircraft records. The investigation revealed that out of 23 battery replacement maintenance activities, one removal and replacement of a battery was not in accordance with maintenance procedures. It appears that the NASIP inspector misinterpreted the Battery Removal History Report.

The error occurred on September 25, 1997 and was corrected by replacing both batteries five days later. Enforcement Investigative Report (EIR) 98SO110065 was filed.

Finding closed.

**2.11.06:** Review of AirTran Airlines aircraft N949VV, a DC-9-32, records revealed that on flight log pages 50286-03 and 50286-04, there was a service check accomplished and an airworthiness release signed and the check accomplished block was not completed. This is contrary to AirTran Airlines General Maintenance Manual 8140.3 B (1) 37.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.11.06 and reviewed all the appropriate documentation. AirTran Airlines' management has addressed the issue with the maintenance personnel involved. In addition, AirTran Airlines has revised their log page form to assist their maintenance in documenting a service check. Enforcement Investigative Report numbers 98SO110048 and 98SO110050 were initiated to further investigate this action.

Finding closed.

**2.11.07:** Work being performed on aircraft in accordance with STC number ST01473AT for converting the aircraft to the 106 seating configuration was not being signed off as it was being performed. The completion of this documentation as work is performed, meets the requirements of 14 CFR Parts 43.9(b), 121.369(b)(1) and 121.369(b)(9).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.07. AirTran Airlines' procedures, engineering documentation, STC data, and aircraft records were reviewed. The Atlanta FSDO was unable to find any regulatory requirements to sign off work as it was accomplished. Further investigation determined that the STC documentation was signed off prior to the aircraft being approved for return to service. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.11.08:** Non-certificated persons performing work on N902VJ concerning the modification of the aircraft in accordance with STC number ST01473AT for converting the aircraft to the 106 seating configuration were not authorized or trained in accordance with AirTran Airlines GMM. This is contrary to AirTran Standard Practice 8130, 14 CFR Part 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.11.08 and reviewed all associated documentation. AirTran Airlines no longer contracts the services of the Leading Edge Aircraft Repair. AirTran Airlines subsequently re-inspected all work that was performed by the repair station and found the results of all work from the contractor to be in compliance.

The FAR's permit non-certificated persons to perform work on aircraft under the supervision of a certificated person. The Atlanta FSDO's investigation determined that the repair station does provide supervision for non-certificated personnel. The personnel responsible for airworthiness determinations were trained and qualified by AirTran Airlines on September 18, 1997 (prior to the first aircraft arriving approximately September 21, 1997).

During the FSDO's investigation it was discovered that the contractor's personnel were using Leading Edge Repair Station inspection stamps to sign for work without the authorization of AirTran Air Lines. Enforcement Investigative Reports 98SO110061 filed on AirTran Airlines for possible inadequate oversight of the repair station and 98SO110062 filed on Leading Edge for apparent improper use of stamps.

Finding closed.

**2.11.09:** N921VV and N946VV, two aircraft modified in accordance with STC number ST01473AT at Leading Edge Inc. did not have a FAA form 337 completed prior to the aircraft being released to service. This is contrary to AirTran Standard Practice 8055, 14 CFR Parts 43.5(b), 43.9(b), 43 appendix B and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.09 and reviewed all the appropriate documentation. AirTran Airlines is revising their Standard Practices to clarify procedures for the use of FAA Form 337. Enforcement Investigative Report number 98SO110037 was initiated.

Closure pending follow-up in accordance with the Atlanta FSDO's action plan.

**2.11.10:** On 9/23/97 aircraft N910VJ and on 10/01/97 aircraft N931VV were returned to service after rudder installations without the required inspection being performed and documented in the aircraft logbook. This is contrary to AirTran Standard Practice 8100, 14 CFR Parts 121.369 and 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.10 and reviewed all applicable rudder installation documentation. On November 3, 1997, the Atlanta FSDO requested and received from AirTran Airlines copies of log pages for aircraft N910VV and N931VV reflecting any and all work involving rudder installation performed by Leading Edge Inc. N910VV's aircraft log page 51134-48, dated September 23, 1997, has a proper sign-off for a rudder installation. N931VV aircraft log page 50857-43, dated October 1, 1997, has a proper sign-off for a rudder installation. The NASIP Team did not provide any specific Items of Proof to review. The follow-up investigation did not disclose sufficient evidence to substantiate the finding.

Finding closed.

**2.11.11:** On 10/24/97 aircraft N921VJ was returned to service after a rudder installation with no indication of who performed the rudder installation, only the required inspection. This is contrary to CFR 14 Part 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.11 and reviewed all associated documentation, including AirTran Airlines procedures and aircraft records for N921VV. On November 3, 1997, AirTran Airlines provided the Atlanta FSDO with a copy of log sheet 51171-25, dated October 24, 1997. Noted on this log page is a proper sign-off for the mechanic and the inspector, respectively, for the removal and installation of the aircraft rudder. The NASIP Team did not provide any specific evidence nor Items of Proof to corroborate this finding. The follow up investigation did not disclose sufficient evidence to substantiate the finding.

Finding closed.

**2.11.12:** The re-installation of identification markers (dent dots) to identify the mapping of acceptable dents at Leading Edge Painting was being accomplished by a non-certificated person. A review of records on N902VJ did not reflect who accomplished the work. There was no way to determine who actually accomplished the work. This is contrary to FAR 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.11.12 and reviewed all appropriate documentation. The uncertificated individual referred to has been identified as an employee of Leading Edge Aircraft Painting and was working under the repair station's certificate in accordance with FAR 145. This uncertificated person placed "dots" on the aircraft to identify where dents were previously located. Trained, authorized, and certificated personnel assured that these "dents" were properly identified in accordance with AirTran's procedures. These personnel were identified in the aircraft's maintenance records.

FAR 145. 39 (a) allows the use of uncertificated employees to perform work on aircraft. A certificated repair station must provide adequate personnel who can perform, supervise, and inspect the work for which the station is to be rated.

All entries on N902VJ's aircraft maintenance documentation were completed in accordance with AirTran's Airlines dent mapping program. Certificated and properly trained personnel inspected and "signed-off" all of aircraft N902VJ's applicable maintenance documents. The follow-up investigation did not disclose sufficient evidence to substantiate this finding.

Finding closed.

**2.11.13:** During surveillance conducted at Leading Edge Painting, the AirTran GMM was checked for revision status. The manual revision was 87, the latest revision of the AirTran GMM was 91. This is contrary to CFR 14 Part 121.133(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.13 and reviewed all applicable documentation. AirTran Airlines states that the most current revision was posted in Leading Edges manual, but the record of revision page was not updated. Leading Edge Aircraft Painting is no longer providing service for AirTran. Airlines. Enforcement Investigative Report 98SO110028 filed.

Finding closed.

**2.11.14:** During surveillance conducted at Leading Edge Painting, It was noted that a copy of the Structural Repair Manual had never been delivered to the contractor by AirTran. The SRM was needed as a reference to perform portions of the work. This is contrary to CFR 14 Part 121.137(a)(1).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.11.14. The investigation revealed all applicable excerpts pertaining to the balancing of the rudder, from the Structural Repair Manual, were sent to Leading Edge by facsimile. Additionally, these items were noted during an inspection performed by the Atlanta FSDO on October 29 and 30, 1997.

Organizationally, AirTran Airlines Standard Practice 8180.3, B, Manual Requirements, states that if any additional instructions , procedures, and service forms are required by the Contract Agency they will be furnished by Maintenance Control.

The NASIP Inspector did not provide documentation as an Item of Proof for this finding. The follow-up investigation, conducted by the Atlanta FSDO inspector, did not disclose sufficient evidence to substantiate the finding.

Finding Closed.

**2.11.15:** Improper maintenance was performed on aircraft N934VV at Atlanta on 11/04/97. Log sheet 50808-34 indicates left engine oil pressure running at maximum normal limit. Sign off read “adjusted oil pressure, checked normal per engine run I/A/W 79-20-03”. Oil pressure read 47PSI for the flight, upon arrival at destination, subsequent engine shutdown, oil pressure indication indicated minus eight (-8) PSI. This is contrary to CFR 14 Part 121.367(c).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.11.15. This included a review of aircraft records for N934VV, the Pratt and Whitney Maintenance Manual, and AirTran Airlines procedures. Research indicates that the aircraft’s left engine oil pressure gauge was operating normally in accordance with the oil pressure indicator’s component maintenance manual (CMM) and the Pratt & Whitney’s JT8D Maintenance Manual. The Atlanta FSDO has reviewed the manufacturer’s CMM and has determined that, in accordance with the unit’s bench test procedure, the indicator needle should normally go off scale (below zero (0)) after engine shutdown . The follow-up investigation did not disclose evidence to substantiate this finding.

Finding closed.

**RELIABILITY PROGRAM****2.12****DESCRIPTION:**

AirTran Airlines does not utilize a reliability program, nor is it authorized in their Operations Specifications.

**INSPECTION DATA:**

None.

**FINDINGS:**

None.

**MAINTENANCE INSPECTION SYSTEM AND REQUIRED INSPECTION ITEMS****2.13****DESCRIPTION:**

AirTran Airlines Maintenance & Inspection Program are contained in individual Maintenance Program Manuals for the DC-9-30 Series aircraft.

Operations Specifications, Part D also lists these programs.

AirTran Airlines General Maintenance Manual (GMM), Section 8100.3, discusses the requirements of RII. Section 8100.4 contains a list of designated required inspection items. Section 8100.2 of the GMM has the prerequisites for RII authorization.

**INSPECTION DATA:**

Inspection and RII systems were examined by the sampling method. Aircraft records and company procedures were reviewed for compliance with 14 CFR Parts 121.367, 121.369, 121.371 and inspection guidance. Training records for 55 maintenance personnel with RII authority were reviewed.

**FINDINGS:**

**2.13.01:** A review was made of the training record of an RII inspector. The current Chief Inspector back dated the RII authorization to 6/24/96 even though the current Chief Inspector was not designated AirTran Chief Inspector until 8/12/97. He then back dated and signed a second RII authorization. He produced a letter stating he had researched the candidates background, which was a false statement as described in the NASIP inspectors statement. This is contrary to 14 CFR Parts 43.12, 121.371(d) & 121.369(b)(3).

*Atlanta FSDO Notes:*

*1) A Required Inspection Item is a designation of items of maintenance and alteration which could result in a failure, malfunction or defect endangering the safe operation of the aircraft if not properly performed or if improper parts or materials are used.*

*2) The individual is selected based upon their background. Their training records and experience is evaluated. The individual is issued a Form VJ-MO24, which informs the individual of his / her selection as a RII inspector. The selectee then signs and returns the VJ-MO24 form to indicate their acceptance of RII authority acknowledgment of having received the necessary training and an understanding of their limitations. Finally, Form VJ-M006 is issued to the RII selectee indicating final authorization to act as an RII inspector. This form is only signed by the chief inspector.*

3) “ValuJet Required Inspection Authorization” card, Form VJ-M006 is a form that certifies the individual as authorized to perform duties as an RII inspector, denotes the aircraft type, and states the extent of his limitations as an RII Inspector. The individual acknowledges his duties and responsibilities, signifies the acceptance by signing his signature and date. The Chief Inspector certifies that all information on the card is correct. The Form VJ-M006 meets the requirement of FAR 121.371(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.13.01 and have reviewed all relevant documents pertinent to this finding. The Atlanta FSDO’s investigation determined the AirTran Airlines’ Chief Inspector reviewed qualification documents for AirTran Airlines’ RII inspectors personnel files prior to the NASIP inspection. On approximately August 1, 1997, the Chief Inspector began reviewing all RII files for complete documentation. The Chief Inspector discovered several errors in the RII personnel files. Based upon supporting documentation that was included in the RII Inspector Files, the Chief Inspector determined that all AirTran Airlines employees possessing a RII authorization were qualified and authorized to perform their duties. Additionally, several VJ -M024 forms were missing the signature of the previous Chief Inspector. In an effort to correct errors found in the files, the Chief Inspector recorded the original dates of certification as stated on the Form VJ-M006 which was included in the RII files.

The Atlanta FSDO has reviewed 100% (32 total) of all AirTran Airlines employees RII records. According to a statement from the present Chief Inspector, the Form VJ-M024s were backdated by himself after carefully reviewing each inspector’s file. When investigating this finding by the Atlanta Flight Standards District Office, additional information was discovered by performing five (5) interviews with AirTran personnel in the inspection office at the time of this occurrence. These interviews, are in conflict with the information provided by the NASIP Inspector’s statement.

The back dating of the Form VJ-M024 does not have significant impact on the affect of this form for the following reasons:

- 1) This form (VJ-M024) is a letter from the Chief Inspector to the person being notified as a candidate being considered as a “RII.”
- 2) The signature and date placed on the Form VJ-M024 by the Chief Inspector does not signify any certification of any information on this form. The recipient acknowledges his training, duties and responsibility.
- 3) In this case, both of the Form VJ-024s were in the individuals training files including signed Form VJ-MO06, RII Authority Card. These cards were signed by a previous ValuJet Chief Inspector. The present Chief Inspector did not originally certify any of the RII Inspector’s Form VJ-M006s in question.

The AirTran General Maintenance Manual does not contain instructions or a procedure for the Chief Inspector to sign or certify information on the Form VJ-M024 (RII Authorization ). No violation of the FARs or AirTran’s General Maintenance Manual has occurred. AirTran is revising its procedure in Standard Practice 8100 to clarify completing the AT-M024 (previously VJ-M024) form by the Chief Inspector. No falsification of any Form VJ-M024s occurred. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**2.13.02:** A review of the current RII list for AirTran Airlines, Inc. disclosed the omission of inspector qualifications. This is contrary to 14 CFR Parts 121.371(a)(d) and 121.369(b)3.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.13.02 and reviewed all applicable documentation. Further investigation determined that all RII inspectors were qualified. AirTran Airlines revised Standard Practice 8100 and updated their RII list by adding inspector authorization and occupational title. AirTran Airlines RII list was not completely in accordance with Federal Aviation Regulations. Further investigation determined that all inspectors were properly qualified. Enforcement Investigative Report (EIR) 98SO110047 filed for the RII list not meeting regulatory requirements.

Finding closed.

**2.13.03:** Review of the “C” check package for AirTran Airlines aircraft N912VV revealed that an AeroCorp Repair Station (DU4R141M) non-routine work card number 83110, the inspector did not sign the work card. This is contrary to the AeroCorp Inspection Procedures Manual, as accepted by AirTran Airlines, and 14 CFR Part 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.13.03 and reviewed all applicable documentation. AirTran Airlines will conduct additional training for the record auditors on sign off procedures. The training was completed on January 22, 1998. Enforcement Investigative Report 98SO0110049 filed.

Finding closed.

**2.13.04:** Review of the “C” check package on aircraft N912VV, dated 6/24/97, revealed the AirTran Airlines “C” check routine tally sheet, page four (4), the supervisor or work controller signature for all work cards accounted for was not signed. This is contrary to AirTran Airlines GMM Standard Practice 8148.6 and 14 CFR Part 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.13.04 and reviewed all appropriate documentation. AirTran Airlines and the repair station have corrected the work cards. Enforcement Investigative Report 98SO0110049 filed.

Finding closed.

**CONTINUING ANALYSIS AND SURVEILLANCE PROGRAM****2.14****DESCRIPTION:**

AirTran Airlines Continuing Analysis & Surveillance Program (CASP) consists of two parts. The first is used for analysis portion of the program by providing an indication of the operating reliability systems and aircraft. The program provides for data collection and analysis to identify areas requiring corrective action.

The second part of the CASP is the audit program and is supervised by the Quality Assurance Department. Its activity included the audit of aircraft records, reliability program, training, Airworthiness releases, deferred maintenance, publications, calibrated tools, parts, material, and vendor/repair stations. The program is controlled by Standard Practices 8700 series.

The AirTran Airlines Maintenance Review Board (MRB) maintains the program. This is done through the analysis of premature equipment removal and reported aircraft discrepancies as well as the evaluation of tear down reports when it is determined that this will aid in product improvement.

Quality Assurance audits line station, contract maintenance and fueling facilities for compliance and adequacy. This includes training, stocking of equipment, mechanic qualifications and housekeeping.

The Vice President of Quality Assurance will review all audits for completeness and accuracy and may alter the frequency of the audits depending upon the conditions reported.

**INSPECTION DATA:**

During the period of October 21, 1997, through November 5, 1997, the continuing analysis and Surveillance Program (CASP) for AirTran Airlines was observed and evaluated. The CASP program's maintenance and inspection systems, records and auditing processes were reviewed. Interviews were conducted with management personnel.

Daily maintenance meetings are held to determine the disposition of the aircraft operated by AirTran Airlines. The Vice President of Quality Assurance and Inspection makes all final decisions.

**FINDINGS:**

**2.14.01:** The GMM does not have adequate instructions for personnel to identify a problem. Engine S/N 657608, C-1 compressor P/N 848101, S/N BB DUAL 1329. This component was obtained from engine S/N667137. The maintenance record MXM 010 indicates Total Time. 67,313.5 and Total Cycles 80418, the actual time should be Total Time 53,749.6 and Total Cycles 47098. This discrepancy failed to alert since the component life limits did not calculate out to the correct time. To verify this correction and back-up AirTran Airlines data, Air New Zealand was contacted and a faxed copy was requested and received.

**Note:** Engine fuel control P/N 743602-4: The S/N is shown as JFC60-2, this is actually the model number. The actual S/N is 92114. This was done at Air New Zealand (ANZZ188C) and should have been picked up by a records audit. This is contrary to 14 CFR Part 121.373(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta (ATL) FSDO have investigated finding 2.14.01 and have reviewed all relevant documentation including Computer Management System (CMS) data sheets and aircraft log book records. A review of aircraft records and time and cycles records for aircraft N932VV was completed by the Atlanta FSDO with zero errors found. The C-1 compressor was found installed on an engine on aircraft N932VV. The Atlanta FSDO conducted a random inspection of seven (7) other aircraft for time and cycle irregularities. All records were verified as being correct.

The MXM010 (Aircraft Records Master File) Maintenance Record referenced in the NASIP finding is not AirTran Airlines' official record for tracking total time and total cycles. The NASIP team did not provide any Items of Proof to support this segment of the finding. During the Atlanta FSDO's subsequent investigation, MXM010 Forms for this engine were reviewed and found that they were completed in accordance with AirTran Airlines procedures.

An additional item of concern was added to this finding. The NASIP inspector reported that an engine fuel control, Part Number 743602-4, was shown to have serial number "JFC60-2" on a Air New Zealand maintenance work sheet. This specific number (JFC60-2) is the model number of the fuel control unit. This model number was recorded inadvertently as the unit serial number by an Air New Zealand mechanic. This error was corrected prior to the engine leaving the Air New Zealand facility. A review of the records for this engine showed no discrepancies.

Closure for this finding is included in a the form of a pending follow-up action plan which includes:

- AirTran Airlines produce an informative training manual for the operation and surveillance of the CMS system.
- AirTran Airlines remove inactive data from screens in order to reduce the appearance of possible system errors.

This follow-up investigation did not disclose corroboration or evidence to substantiate the finding.

Finding closed.

**2.14.02:** Review of AirTran Airlines Maintenance Alerting Procedures, revealed that AirTran Airlines does not take quick positive action on a recurring discrepancies. Reviewing aircraft N949VV recurring weather radar malfunctions, which began on August 8, 1997 and is still on going, indicates that management is more interested in flying the aircraft than properly repairing the system. An interview with the CASP manager confirmed this. This is contrary to the CASP Manual and 14 CFR Parts 121.373, 121.363(a) and 121.367(a)(b)(c).

The AirTran Airlines CASP program is fails to detect and make corrections in deficiencies in AirTran Airlines maintenance procedures. Deficiencies were found in AirTran Airlines policies and procedures in that existing procedures are not being followed or policies and procedures do not exist. Maintenance and inspection personnel training and records are not complete.

**CORRECTIVE ACTION:** The Atlanta FSDO investigated finding 2.14.02 and reviewed all pertinent documentation including AirTran Airlines Maintenance Detail Report for N949VV. The Detail Report shows that the weather radar was first written up on August 8, 1997. Subsequently, it has been written up 26 more times before it was repaired on October 29, 1997, their have been no more problems reported with the radar since. Each time it was written up, corrective action was taken. On several occasions the radar would work for a short period (one day) without problems. Several other occasions it would operate correctly for several days without problems. The Atlanta FSDO informed AirTran Airlines in a letter dated December 20, 1997 of the FAA's concern that the airline improve their timely corrective action of noted discrepancies. AirTran Airlines responded to these considerations on January 20, 1998 and agreed to make appropriate improvements to the airline's maintenance procedures. The enhancements are due to be submitted to the Atlanta FSDO by March 20, 1998.

With regard to the NASIP inspectors comment that this finding,  
“indicates that management is more interested in flying the aircraft than properly repairing the system.”

The NASIP inspector verbally indicated to the Atlanta FSDO that this impression was received from the AirTran Airlines' CASP Manager. A discussion with the CASP manager refuted this point of view. He indicated that this opinion originated with the NASIP inspector. Additionally, he strongly denied agreeing with the NASIP inspector “that management is more interested in flying aircraft than properly repairing them.” The Atlanta FSDO has been unable to substantiate the NASIP inspector's allegation contained within this finding.

Inspectors of the Atlanta FSDO in concert with other FAA inspectors (members of the FAA's Certification, Standardization, and Evaluation Team) from outside the Atlanta office, conducted a in-depth review of the CASP program and found no systemic safety concerns to exist. In the Atlanta FSDO's review and also the examination of the Certification Evaluation Standardization Team (CSET) member sent to this office to evaluate the CASP Program, only one area of concern was noted. The area of concern was timely corrective action of known discrepancies. The Atlanta FSDO met with AirTran Airlines CASP manager and discussed this issue. AirTran Airlines has agreed to revise the CASP Program with a target date for revision of March 20, 1998.

Closure pending follow up action in accordance with the Atlanta FSDO's Action Plan.

**2.14.03:** Leading Edge Aircraft Painting Inc., was audited on 9/04/97 to allow exterior painting and associated rudder balancing by the AirTran Airlines vendor auditing department. Discrepancies were documented and approval was not granted as indicated by form VJ-M037 for any work until 10/20/97. All work performed before 10/20/97 should not have been accomplished. This is contrary to 14 CFR Part 121.373.

Other indicators of systemic deficiencies are listed elsewhere in this report but are summarized as follows:

1.07.03	2.04.05	2.06.02	2.07.03	2.10.01	2.11.08
2.03.03	2.04.06	2.06.03	2.07.04	2.11.01	2.11.09
2.03.06	2.04.07	2.06.04	2.07.05	2.11.02	2.11.10
2.03.07	2.04.08	2.06.05	2.08.02	2.11.03	2.11.11
2.04.01	2.04.09	2.06.07	2.08.03	2.11.04	2.11.12
2.04.02	2.04.01	2.06.08	2.08.04	2.11.05	2.11.13
2.04.03	2.05.02	2.07.01	2.08.05	2.11.06	2.11.14
2.04.04	2.06.01	2.07.02	2.09.02	2.11.07	2.16.01

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.14.03 and reviewed all the applicable documentation. AirTran Airlines performed an audit of Leading Edge Painting Inc. a Part 145 repair station, on September 04, 1997 and recorded results on a VJ-M080 (Audit Checklist) Form. AirTran Airlines Form VJ-M037 (Vendor Approval Form) was issued to Leading Edge giving the vendor conditional approval on September 04, 1997.

General Maintenance Manual Standard Practice 8230, page 13, which was in effect at the time of the NASIP inspection allows for vendor approval with minor discrepancies. The reason for the conditional approval was to allow for the correction of minor discrepancies which would not have a safety impact on the aircraft work. The AirTran Computer Vendor master listing was updated October 20, 1997 and did not reflect the date the audit was performed due to a delay in getting the information into the system. The audit was performed on the facility on September 4, 1997. The Atlanta FSDO's follow-up investigation discovered no evidence to substantiate this finding.

Part two of the finding states that systemic deficiencies were listed in other parts of the report. Of significant note is that 29 of 48 of the findings listed above (60.4%) are findings which could not be verified nor substantiated by the Atlanta FSDO.

*Atlanta FSDO Note: Continuing Analysis and Surveillance Program (CASP) - FAR 121.373 compels the operator to provide a system for continuing analysis and surveillance of it's continuous airworthiness maintenance program including work performed according to that program or by another person.*

*Whenever the Administrator finds that the program does not contain adequate procedures and standards to meet these requirements, the certificate holder, after notification by the Administrator, must make the necessary changes to the program. FAA Order 8300.10, the Airworthiness Inspector Handbook, chapter 65, addresses the evaluation of Continuing Analysis and Surveillance Program. The program must be included in the operator's maintenance program. The program must include the following two basic function's:*

*Audit*

*Which includes a follow up for those components removed and their respective teardown reports. This report must include an examination of the supervisory and administrative aspects of the operator's program to include work performed outside the operator's basic organization. The audit report must ensure that the Main Base, Sub Base, Line Stations, and shops operate in accordance with the operators written procedures.*

*The audit must ensure that all publications and work forms are current and readily available to the user.*

*The audit must ensure that major repairs / alterations are classified properly and accomplished with approved data.*

*The audit must ensure that carryover items and deferred maintenance are properly handled.*

*The audit must ensure that vendors are properly authorized, qualified, staffed, and equipped to perform the contractor's function according to the operator's manual.*

*AirTran Airlines Standard Practice addresses the CASP with regards to the audit functions. Standard Practice 8231 addresses the vendor approval procedures. Both Standard Practices have been accepted by the Atlanta FSDO and meet the intent of the Federal Aviation Regulations.*

*Performance Analysis Function*

*The performance analysis function includes daily and long term monitoring and emergency response related to the performance of affected aircraft systems, including aircraft engines and components. This includes the monitoring of such items as:*

*Daily mechanical problems for affected aircraft.*

*Deferred maintenance items including excessive number and times to be (monitored daily).*

*Pilot reports compiled by Air Transport Association (ATA) codes.*

*Mechanical Interruption Summary Reports (MIS)*

*Contained engine failures*

*High number of unscheduled component removals.*

*These items are identified in AirTran Airlines CASP manual Standard Practices 8700 (AirTran CASP), 8702(AirTran Maintenance Review Board), 8704 (Data Collection Systems), 8706 (Data Analysis Systems), 8708 (Program Displays and Corrective Action Status), 8710 (Maintenance Program Corrective Action Systems), 8712 (CASP Program Revision Process), 8714 (Inspection Analysis and Monitoring Program), 8716 (Monthly CASP Report Example), 8718 (CASP Affiliated Documents, Reports, and Forms), and 8720 (Definitions of Significant Terms). These Standard Practices meet the intent of the Federal Aviation Regulations and have been accepted by the Atlanta FSDO.*

AirTran Airlines is not required to have a reliability program and has elected not to have one at this time. Other items to be included in the CASP system are maintenance scheduling, control and accountability of work forms, conformity to technical instructions, and compliance with procedural requirements.

The only Item of Proof offered by the NASIP team for Finding 2.14.03 was the company Standard Practice 8708 (Program display and Corrective action status), minutes of ValuJet CASP and MRB meeting September and October of 1997. There is no explanation available or provided as to how the NASIP inspector relates this information to the finding.

The Atlanta FSDO reviews the CASP Report, which AirTran Airlines publishes on a monthly basis, and attends the CASP meetings. We also continually review the Program Tracking and Reporting System (PTRS) of the FAA Flight Standards Automated System (FSAS) to evaluate any systemic problems becoming apparent within the AirTran Airlines Maintenance organization. In the Atlanta FSDO's review and also the examination of the Certification Evaluation Standardization Team (CSET) member sent to this office to evaluate the CASP Program, only one area of concern was noted. The area of concern was timely correction of known discrepancies. The Atlanta FSDO met with AirTran Airlines CASP manager and discussed this issue. AirTran Airlines has agreed to revise the CASP Program with a target date for revision of March 20, 1998.

Closure pending follow up action in accordance with the Atlanta FSDO's Action Plan.

**MECHANICAL REPORTING PROCEDURES****2.15****DESCRIPTION:**

AirTran Airlines utilizes a system of mechanical reliability reports (MRR) identified in Standard Practice 8170 of the General Maintenance Manual. The Vice President of Maintenance or his designee is responsible to monitor all "Maintenance Delay and MRR Forms" to determine if any reports fall into requirements for MRR's (14 CFR Part 121.703). In addition, Inspection and Maintenance Supervision will monitor routine checks and inspection findings and report any occurrence which falls within the MRR criteria to the Vice President of Quality Assurance. Contract maintenance facilities are required to report to the Manager of CASP who in turn will notify the Atlanta FSDO.

**INSPECTION DATA:**

Samples of mechanical reliability reports, mechanical interruption reports and engine and aircraft utilization reports were reviewed for submittal on a timely basis by the operator to the FAA.

**FINDINGS:**

None

**MAJOR REPAIR AND ALTERATION CONFORMITY****2.16****DESCRIPTION:**

The AirTran Airlines GMM provides for the identification and processing of all major repairs and alterations. Standard Practice 8050 provides for repair of structural damage for in service aircraft. The company employs an engineering department that supports the major repair and alteration activity.

**INSPECTION DATA:**

Review of records for major repair and alterations was accomplished on over 50% of the aircraft. It was found that all items were accomplished with approved data.

**FINDINGS:**

**2.16.01:** Section 8055 of AirTran Airlines GMM item 8055.3 F(2) Note: Require FAA Form 337 to be submitted by each vendor performing major repairs or alterations. Several Discrepancies were found during a sampling of engine overhaul records performed by AeroThrust Corporation. Several work packages completed by the repair station indicating work being completed are documented on FAA Form 337 and are provided to AirTran Airlines without block 7 being completed. This could lead to non-compliance with 14 CFR 121.367(a).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.16.01 and reviewed all appropriate documentation. A meeting was held with AirTran Airlines officials pertaining to this matter on January 17, 1998. AirTran Airlines agreed to make the appropriate changes to their Standard Practice as verified in their letter of January 21, 1998.

Closure pending follow-up in accordance with the Atlanta FSDO's action plan.

**FUELING AND SERVICING****2.17****DESCRIPTION:**

AirTran Airlines uses the Standard Practice, and AirTran Airlines fuel handling Manual, to cover and identify fuel handling and aircraft fueling. Ogden Aircraft Services handles the Pipe Lane and Tank Farm. Airport Group International does the actual fueling of AirTran Airlines aircraft.

**INSPECTION DATA:**

Reviewed AirTran Airlines Fuel Handling Manual, titled "Fuel Manual" Standard Practice.

**FINDINGS:**

**2.17.01:** A review of AirTran's Fueling Manual revealed inconsistencies with industry practices as depicted in the accompanying IOP.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO have investigated finding 2.17.01 and reviewed all the appropriate documentation. The Atlanta FSDO reviewed AirTran's fueling manual and found it acceptable. AirTran is making minor changes to their fueling manual to correct typographical errors. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding Closed.

**AIRCRAFT RAMP INSPECTION****2.18****DESCRIPTION:**

AirTran Airlines, Inc. is operating thirty one McDonnell Douglas DC-9-32 aircraft operating under Part 121 and headquartered at Hartsfield International Airport, Atlanta GA.

**INSPECTION DATA:**

Ramp inspections were accomplished on AirTran Airlines aircraft utilizing standard DC-9 inspection criteria and to determine adherence to their manual. In accordance with applicable Airworthiness requirements.

**FINDINGS:**

**2.18.01:** On 10/22/97, N931VV was inspected in Atlanta, GA (ATL). During the inspection, it was observed that the required placards for the tailcone release and red arrow, on the right aft side of the aircraft were deteriorated and difficult to read. Maintenance personnel were notified of the finding. A review of log book pages 51190-45 through 51190-47, revealed that the discrepancy was not entered in the aircraft log book. This is contrary to 14 CFR, Part 43.13(c), 121.363(a)(1)(2) and 121.367(a)(b)(c).

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO office have investigated finding 2.18.01 and reviewed all the relevant documentation. AirTran Airlines maintenance personnel inspected the tail cone placards after the NASIP inspector notified the Maintenance Department. No pictures or Items of Proof were provided for this finding by the NASIP inspector. AirTran Maintenance personnel found that the placards were serviceable at the time of their inspection and that they were not contrary to any Federal Aviation Regulations. Tail cone placards were replaced on November 06, 1997. The maintenance entry was recorded on the aircraft log book page 51239-06 with the appropriate corrective action while performing a service check. No verifiable evidence nor substantiation could be found for this finding.

Finding closed.

**2.18.02:** A ramp inspection of aircraft N935VV found the rubber lining around the cockpit coming off. A large piece was in the direct view of the first officer's primary line of sight through the window.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.18.02 and reviewed all the appropriate documentation. AirTran Airlines immediately secured the lining and made an appropriate logbook entry. Enforcement Investigative Report (EIR) number 98SO110023 was initiated.

Finding closed.

**2.18.03:** A ramp inspection of aircraft N901VV on 10/21/97, disclosed the first officer's oxygen regulator controller shear wire broken and the screw not secured.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated Finding 2.18.03. AirTran Airlines personnel immediately replaced the safety wire and made an appropriate log book entry on log page 51241-28. Enforcement Investigative Report (EIR) number 98SO110023 was initiated.

Finding closed.

**2.18.04:** During ramp operation at ATL the number two (2) engine service door was observed as not being secured just prior to engine start for revenue flight. AirTran Airlines flight 328, N939VV, 10/28/97. The captain was alerted and maintenance was summoned to secure the oil servicing access. The captain stated that the maintenance provider was servicing the engine oil when he completed his walk around. The mechanic stated that he was called from the job by a fueler and forgot to return to the engine to close the door.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated this finding and reviewed all relevant documentation. AirTran Airlines took appropriate action before the aircraft was returned to revenue service by securing number 2 engine oil servicing access door. The individual mechanic who had been working on aircraft N939VV, servicing the number two engine, was reprimanded by letter by AirTran Airlines with two days suspension without pay. Additionally, the mechanic received counseling from the airline's Training Department.

**MAINTENANCE SPOT INSPECTION****2.19****DESCRIPTION:**

AirTran Airlines accomplishes “B” checks utilizing company assets and contracts letter checks of “C” or higher and all major repairs and alterations.

**INSPECTION DATA:**

The team conducted spot inspections at the Atlanta facility, three contract maintenance facilities and two line maintenance stations.

**FINDINGS:**

Findings discovered on aircraft undergoing maintenance were placed other categories.

**AGING AIRCRAFT PROGRAM****2.20****DESCRIPTION:**

AirTran Airlines has an approved Corrosion Prevention Control Program (CPCP) which is incorporated in the Continuous Airworthiness Maintenance Program. AirTran Airlines is following the McDonnell Douglas document MDC - K4606, Revision number 5, dated February 14, 1997, and AD 92-22-08. Both of these documents are addressed.

**INSPECTION DATA:**

Reviewed work packages to determine inclusion of CPCP task cards and records for submission of required reports under the CPCP.

**FINDINGS:**

**2.20.01:** The work cards were spot checked throughout the program and the implementation formula was found to be correct. The Standard Practice shows no program or instructions for reporting corrosion findings as required by:

1. MDC - K4600, Section 5, Level 1, Level 2, Level 3.
2. AD 92-22-08, R1. Note - 10.
3. A/C 43-4A.

The training Program does not follow the requirements as outlined in MDC - K4606, Appendix B, 2-13.

The AirTran Airlines program should include vendor training, not the acceptance of a program that may be in place at a vendor. As an example,

1. Visual (Requires a vision check)
2. Tap Test (Requires a hearing test)

These findings could possibly be a non-compliance issue.

**CORRECTIVE ACTION:** Personnel from the Atlanta FSDO investigated finding 2.20.01 and reviewed all the appropriate documentation. MDC-K4606 Appendix B-2.13 does not have any requirements for training. The AirTran Airlines GMM approves vendors prior to performing work. In accordance with the GMM, the airline may accept prior maintenance training if applicable. Standard Practice 8170 covers Mechanical Reliability Report of corrosion found and the maintenance program work cards require reporting of all corrosion found. McDonnell Douglas receives a quarterly report of all corrosion findings by AirTran Airlines.

AirTran Airlines follows all the reporting requirements of Airworthiness Directive 92-22-08R1. AirTran Airlines had on file, at the time of the inspection, an accepted NDT program which meets ATA Standard 105 (NDT qualifications) and all appropriate personnel were vision tested. To enhance the program they have, since the NASIP inspection, required all the inspector work force to take a hearing test. The follow-up investigation did not disclose evidence to substantiate the finding.

Finding closed.

**SFAR 36 AUTHORIZATION****2.21****DESCRIPTION:**

SFAR 36 Authorization is not applicable to AirTran Airlines operation.

**INSPECTION DATA:**

AirTran does not have SFAR Authorization

**FINDINGS:**

None.

**End of Report**